



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555-0001

RADIOACTIVE MATERIAL CONTAINER SUPPLIER INSPECTION

ORGANIZATION: MMP Quality Inspections, Inc.  
1875 Coronado Avenue  
Signal Hill, California 90804

CONTACT: Mr. Alex A. Bagarry, III  
Radiation Safety Director  
(310) 597-3932

ACTIVITY: Maintenance and use of radioactive material packagings.

QUALITY ASSURANCE PROGRAM APPROVAL NO.: 0688

INSPECTION REPORT NO.: 94202

Inspection Location:  
Signal Hill, California

Inspection Date:  
February 7, 1994

On-site Inspection  
Hours: 16

INSPECTION BASIS AND SCOPE:

- A. BASIS: 10 CFR Part 71, 10 CFR Part 21, and Certificate of Compliance Nos. 9007, 9032, 9033, 9056, 9141, 9147, 9157, as secondary user.
- B. SCOPE: To determine whether procedures have been established, documented, and executed that meet the requirements of 10 CFR Part 21 and 10 CFR Part 71. To determine if the procedures fulfill commitments made in the NRC-approved Quality Assurance Program.

## RADIOACTIVE MATERIAL CONTAINER SUPPLIER INSPECTION

INSPECTION REPORT NO.: 94202

## FINDINGS:

Nonconformances with the requirements of 10 CFR Part 71, Sections 105, 111, 113, 125, and 137 were identified.

INSPECTION TEAM LEADER:

Dennis G. Reid  
Dennis G. Reid  
NMSS/IMNS

DATE:

4/6/94

INSPECTOR:

Thomas O. Matula  
Thomas O. Matula  
NMSS/IMNS

DATE:

4/7/94

REPORT APPROVED BY:

Robert L. Baer  
Robert L. Baer, Chief  
Source Containment and  
Devices Branch, NMSS

DATE:

4/11/94

## 1. SUMMARY

A U.S. Nuclear Regulatory Commission inspection team conducted an announced inspection of MMP Quality Inspections, Inc. (MMP), in Signal Hill, California, on February 7, 1994.

The inspection team reviewed MMP's quality assurance (QA) activities to determine whether QA procedures had been established, documented, and executed in fulfillment of commitments made in the NRC-approved QA Program. Inspection findings are based on data collected through review of procedures and controls, inspection of selected documents and records, and interviews with personnel.

The inspection team identified items of nonconformance regarding 10 CFR Part 71, Subpart H. The items of nonconformance are summarized in Table 1.

Table 1  
Items of Nonconformance

10 CFR Part 71, Section	Subject	No. of Findings
105	Quality assurance program	1
111	Instructions, procedures, and drawings	3
113	Document control	3
125	Control of Measuring and Test Equipment	2
137	Audits	1

## 2. DETAILS

NRC conducted an announced inspection at the MMP facility in Signal Hill, California, on February 7, 1994. The inspection team reviewed documentation representing implementation of the QA functions. The inspection team focused on maintenance activities and use of transportation packagings with NRC Certificates of Compliance (COCs).

The objectives of the NRC inspection were to verify that the QA functions were accomplished in compliance with regulatory requirements and to determine if MMP's QA program complied with commitments made to NRC.

The inspection team evaluated the performance of QA activities from the perspective of two functional control elements: management and maintenance. The inspection team focused on the QA activities regarding the packaging models listed in Table 2.

Table 2  
Packaging Models

COC No.	Model No.
9007	100-520-014
9032	65002
9033	66030
9056	1000
9141	90090
9147	85090
9157	1A

### 2.1 Persons Contacted

An entrance meeting was held on February 7, 1994, to present the objectives of the NRC inspection. An exit meeting was held the same day, to present the preliminary findings of the inspection. The individuals present at the entrance and exit meetings are listed in Table 3.

Table 3  
Entrance/Exit Meeting Attendees

*	A. Bagarry, III	Radiation Safety Director
**	M. Pickard	Chief Executive Officer
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*	Present at entrance and exit meeting.	
**	Present at exit meeting.	

## 2.2 Management Controls

The inspection of management controls focused on the extent to which MMP had implemented the QA Program, and the independence and proficiency of QA personnel responsible for fulfilling QA commitments. The inspection team determined QA program effectiveness by reviewing administrative procedures and interviewing staff members.

A nonconformance was identified regarding 10 CFR § 71.105, "Quality assurance program." This section requires the licensee to provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. Similarly, Procedure No. MMP-RT-OEP-001, Gamma and X Radiography Operating and Emergency Procedure, Paragraph 3.2, requires each radiographer to receive refresher training every six months.

Contrary to the above, MMP's training records showed that refresher training for one radiographer was past due.

Nonconformances were identified regarding 10 CFR § 71.113, "Document control." This section requires the licensee to establish measures to control the issuance of documents, such as instructions, procedures, and drawings, including changes, which prescribe all activities affecting quality, and that these measures must assure that documents, including changes, are reviewed for adequacy.

Contrary to the above, the inspection team found instances where implementation of this requirement was inadequate.

1. Two MMP Radiation Survey Reports (MMP-RT-006), which were initiated on 10/15/93 and 10/14/93, were not dated by the radiographer, as required, when the activity was completed.

2. MMP Procedure No. RT-OEP-1.6, "Radiation Safety and Control Program Radioactive Materials - Sealed Sources Leak Test Procedure," indicated that the cover sheet was signed by the Radiation Safety Director on 8/26/93; however, the remaining pages in the procedure were dated 1/31/91.

A nonconformance was identified regarding 10 CFR § 71.137, "Audits." This section requires the licensee to carry out a comprehensive system of planned and periodic audits, to verify compliance with all aspects of the QA program, to determine effectiveness of the program, including follow-up actions as required.

Contrary to the above, MMP's audit records showed that no corrective action was initiated for open item No.4 on its Satellite Office Auditing Policy Checklist, dated 12/6/93, since the date its internal audit was performed.

Nonconformances were identified regarding 10 CFR § 71.111, "Instructions, procedures, and drawings." This section requires the licensee to prescribe activities affecting quality by documented instructions, procedures, or drawings, and requires that these instructions, procedures, and drawings be followed.

Contrary to the above, the inspection team identified instances where procedures were not followed.

1. The "Level II Inspectors and Visual Inspectors Certification Program" requires an annual visual acuity test to be performed. Visual acuity testing for three inspectors was due in December 1993 but had not been performed.
2. Procedure MMP-RT-OEP-001, Paragraph 10.2.2, states that permanent storage areas be surveyed at three-month intervals; however, the survey records showed that the storage area was last surveyed at an eight-month interval instead.
3. Procedure No. MMP-RT-OEP-001, Paragraph 3.1 states that initial training for radiographers shall include a minimum of 520 hours of documented on-the-job training. However, this requirement was inadequately documented and, therefore, could not be verified.

A nonconformance was identified regarding 10 CFR § 71.113, "Document control." This section requires the licensee to establish measures to control the issuance and revision of documents which prescribe all activities affecting quality. These measures must assure that documents, and changes to documents, are reviewed for adequacy, and approved for release by authorized personnel.

Contrary to the above, the inspection team identified an instance where control of the Radiation Safety Training Manual was inadequate. The manual showed missing or incomplete document control information as follows: Part I had no revision or approval block; Parts II through V did not have approval signatures and revision dates.



Nonconformances were identified regarding 10 CFR § 71.125, "Control of measuring and test equipment." This section requires the licensee to establish measures to assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are properly controlled, calibrated, and adjusted at specific times to maintain accuracy within necessary limits.

Contrary to the above, the inspection team identified instances where control of measuring and test equipment was inadequate.

1. The equipment listed in Table 4 was found to be past due for calibration.

Table 4  
Equipment Past Due Calibration

Make	Model No.	Serial No.	Due Date
NDS	ND-2000	3802	12/29/93
NDS	ND-2000	4163	12/29/93
NDS	ND-2000	4165	01/29/94
INC	MOD-2	900161	01/22/94
INC	MOD-2	900166	12/27/93

2. MMP's Receiving Inspection Reports did not identify the survey meters that had been receipt inspected. As a result, inspection status of individual pieces of equipment could not be verified. Furthermore, traceability to their calibration record was not maintained.
3. DOCUMENTS REVIEWED
  - 3.1 Procedures, Drawings and Specifications

MMP-QC-NRC, 10 CFR 71 QA Program For Industrial Radiography, Revision 0, dated 02/03/93.

Radiation Safety Training Manual, Radiation Safety and Control Program.

RT-OEP-1.3, Document Control Procedure, dated 01/25/94.

MMP-RT-OEP-001, Gamma and X Radiography Operating and Emergency Procedure, Revision 2, dated 03/12/93.

Quality Assurance Program for Radioactive Material Packages, dated 02/03/94.

MMP-RT-OEP-001, Revision 2, Gamma and X Radiography Operations and Emergency Procedure, dated 2/7/92.

RT-OEP-1.6, Sealed Sources Leak Test Procedure, dated 8/26/93.

RT-001, Quarterly Inspection of Radiography Personnel C.R. & C.H., dated 1/31/94.

Satellite Office Auditing Policy, dated 12/6/93.

### 3.2 Procurement Documents

Invoice No. 015835, Brown Bolt and Nut Corporation, Paramount, CA, dated 07/11/91.

### 3.3 Logs, Certification Records, and Training Records

Roster of Qualified Radiographers, Assistants, and Assistants Candidates.

Survey Meter Calibration Status Log, dated 01/28/94.

Alarming Ratemeter Calibration Certificates.

Survey Instrument Calibration Records.

Dosimeter Calibration Records.

Level II inspectors and visual inspectors certification expiration dates, dated 01/05/94.

Quarterly inventory and inspection of devices for 1992, 1993, and 1994.

Radiation Safety and Control Program, Source Utilization Logsheets.

Dosimeter Measurement Certificates.

Survey Instrument Calibration Records.

Roster of Qualified Radiographers, dated 2/1/94.

Receiving Reports

Survey Calibration Records

Radiation Safety Training for E.H. and L.D.

Radiation Survey Reports

Radiation Materials Storage Area Reports.