



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

MAY 10 1994

Docket: 030-28641  
License: 42-23539-01AF

Department of the Air Force  
USAF Radioisotope Committee  
ATTN: Lt. Colonel Joseph J. Donnelly  
HQ AFMOA/SGPR  
8901 18th Street  
Brooks Air Force Base, Texas 78235-5217

SUBJECT: NRC INSPECTION REPORT 030-28641/94-04 (NOTICE OF VIOLATION)

This refers to the special, announced inspection conducted by Mr. Kent M. Prendergast of the NRC Region IV field office in Walnut Creek, California. The inspection, which was conducted on March 10, 16, 31, and April 8 and 11, 1994, at McClellan Air Force Base (AFB), California, included a review of licensed activities authorized by Byproduct Materials License 42-23539-01AF under Air Force Permit No. 04-10117-2AFP. At the conclusion of the inspection, the findings were discussed with members of your staff. Additionally, a telephonic exit briefing was held on March 31, 1994, with Lt. Colonel Joseph J. Donnelly and other members of your staff. The enclosed NRC Inspection Report 030-28641/94-04 documents this inspection.

The inspection was an examination of activities conducted under the license as they relate to the March 7, 1994, incident at McClellan AFB. The incident involved the unsuccessful transfer of three californium-252 neutron radiography sources from their carrier to their storage well. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observation of activities in progress related to the incident.

Based on the results of this inspection, five violations were identified. These resulted from a failure to execute a program to comply with the safety requirements described in 10 CFR Part 34 which was required by the permit. Specifically they relate to failures to maintain adequate operating and emergency procedures, perform required inspection and maintenance of radiographic equipment, calibrate neutron survey meters quarterly, and affix a durable tag to the radiographic sources to meet 10 CFR 34.25(e). These violations are described in the enclosed Notice of Violation (Notice).

You are required to respond to this letter for this and the other violations in the Notice and should follow the instructions specified in the Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will

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determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

The inspector determined that there were no significant personnel exposures resulting from the unsuccessful source transfer and that the sources remained safely contained within the shielded bunker. However, these events indicated deficiencies in the management and control exercised over these radiographic operations. It was noted that on April 10, 1994, the USAF Radioisotope Committee amended the permit at McClellan AFB to authorize storage only of the neutron sources.

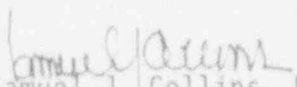
As a result of telephonic discussions between Colonel Donnelly and Mr. Charles Cain of my staff, a Confirmatory Action Letter (CAL) is being forwarded to you under separate cover relating to our concern that the Air Force did not submit, prior to use of the radiography device in 1989, documentation describing the device for evaluation pursuant to 10 CFR 32.210. The CAL confirms that you will not resume use of the device until such an application is submitted to us along with other specified documents.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this letter, please contact Ms. Linda McLean or Mr. Charles Cain of my staff.

Sincerely,

  
Samuel J. Collins, Director  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. Appendix A - Notice of Violation
2. Appendix B - NRC Inspection Report  
030-28641/94-04

cc:  
California Radiation Control Program Director

bcc:  
DMB - Original (IE-07)  
LJCallan  
SJCcollins  
RAScarano, DRSS/RIV  
JDWeiss, OC/LFDCB (4503)  
\*WLFisher  
\*CLCain  
\*MLMcLean  
\*NMIB  
\*MIS System  
\*RIV Files (2)  
\*FAWenslawski, WCFO  
\*KMPredergast, WCFO  
JASmith, NMSS (6 H3)  
GPYahas, WCFO

W/IFS Form

RIV:NMIB	C:NMIB <i>ole</i>	DD:DRSS	D:DRSS	
MLMcLean <i>MM</i>	CLCain		SJCcollins	
04/28/94	04/29/94	04/ /94	04/ /94	

PREVIOUS CONCURRENCE PAGE

Department of the Air Force  
 USAF Radioisotope Committee

- bcc:  
 DMB - Original (IE-07)  
 LJCallan  
 SJCcollins  
 RAScarano, DRSS/RIV  
 JDWeiss, OC/LFDCB (4503)  
 \*WLFisher  
 \*CLCain  
 \*MLMcLean  
 \*NMIB  
 \*MIS System  
 \*RIV Files (2)  
 \*FAWenslawski, WCFO  
 \*KMPredergast, WCFO  
 JASmith, NMSS (6 H3)  
 \*GPYahas, WCFO  
 JEGlenn, NMSS (6 H3)  
  
 \* W/IFS Form

RIV:NMIB*	C:NMIB <i>we</i>	DD:DRSS	D:DRSS	
MLMcLean	CLCain		SJCcollins	
04/ /94	05/5/94	04/ /94	04/5/94	

\* previously concurred