

JAN 2 1991

In Reply Refer To:  
Docket No. 30-28741/90-01  
License No. 03-23185-01

Tumbleweed X-Ray Company  
AIA: Otho G. Jones  
Radiation Safety Officer  
P.O. Box 1210  
Greenwood, Arkansas 72936

Gentlemen:

This letter acknowledges our receipt of: (1) your letter dated December 4, 1990, in response to our letter and attached Notice of Violation both dated November 8, 1990; and (2) a report dated December 2, 1990, referring to an audit conducted by an independent auditor as required by the Order Modifying License issued by NRC to Tumbleweed X-Ray on September 5, 1990.

We have reviewed your response to the Notice and find that additional information is needed. Specifically, we note that you have not responded fully to the items identified on page 2 of the Notice for Violation 3. Consequently, you are requested to address the items described below for this specific violation. Your reply to this letter should be provided to the NRC Region IV office within 10 days of your receipt of this letter.

The results of the audit conducted on November 17 and 24, 1990, as noted in the aforementioned report, indicate that corrective actions had not been fully implemented at that time. However, we are pleased to note that you have proposed corrective actions which include further details beyond those referenced in your reply to the Notice. The report indicates that you intend to have all corrective actions fully implemented by March 1991. If there is any change requiring additional time for correction of the violations, please indicate so in your reply to this letter.

We appreciate your response regarding our comment on the observation of a failure to conduct a required survey during a radiographer field audit conducted in an Agreement State. While the notation of your observation served to demonstrate that you are attentive to this requirement, NRC believes it is important that the significance of this failure and the potential risks involved be clearly communicated to individual radiographers. Your response appears to indicate that this has been done with the individual involved; however, we encourage that you instruct the remainder of your staff as well.

This also acknowledges receipt of dosimetry records for a radiographer employed by Tumbleweed X-Ray, as requested during our recent investigation of the overexposure of a Tumbleweed employee. The findings of our current investigation of the overexposure are, at this time, considered separate issues from those identified during our September 1990 inspection. These findings will be discussed in the inspection report which will be issued at the conclusion of our investigation of this problem.

RIV:NMSIS *LLK*  
LLKasner:cd  
12/28/90

C:NMSIS *CLC*  
CLCain  
12/28/90

D:DRSS  
ABBeach  
12/30/90

9101090055 910102  
REG4 LIC30  
03-23185-01 PDR

IE-07  
11

Violation 3

This violation does not refer to the complete failure to have maintained records of physical inventories of sealed sources, but rather to the failure to have maintained records of physical inventories for the specific sources noted in the citation. Additionally, those records which had been maintained did not contain all identifying information, such as sealed source material and the activity of the source, as required under 10 CFR 34.26.

In your reply you should provide a description of: (1) the corrective actions taken to ensure that records of physical inventories are maintained for each sealed source possessed under the license, (2) the corrective actions taken to ensure that all required information is included on physical inventory records, and (3) the measures taken to prevent recurrence of the violation.

Should you have any questions regarding this matter, please contact Linda Kasner at (817) 860-8100.

Sincerely,

*Original Signed By:*

A. B. BEACH

A. Bill Beach, Director  
Division of Radiation Safety  
and Safeguards

cc:  
Arkansas Radiation Control Program Director

bcc:  
DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
MRodriguez, OC/LFDCB (4503)  
WLFisher  
CLCain  
LLKasner  
NMSIS  
MIS System  
RIV Files (2)  
RSTS Operator  
REHall, URFO