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MEMORANDUM FOR: Roy J. Caniano, Chief, Nuclear Materials Safety Branch

FROM: W. L. Axelson, Director, Division of Radiation Safety and Safeguards

SUBJECT: DRSS SELF-ASSESSMENT OF DRAFT INSPECTION FIELD NOTES FOR THE LEVEL OF MANAGEMENT AND NUMBER OF AUTHORIZED USERS INTERVIEWED DURING THE INSPECTIONS AND THE USE OF PERFORMANCE-BASED INSPECTION TECHNIQUES. NO. 94-01

We have independently reviewed draft field notes for 13 inspections of 12 licenses (listed on the attached page). No inspectors were specifically contacted during the review. The review was performed to determine if an appropriate level of management and number of authorized users were contacted during the inspections, and to determine if performance-based inspection techniques were being used. Results of the review are discussed below.

Level of Management--Overall, the notes indicated that an appropriate level of management had been contacted by the inspectors. Typically, the RSO and a manager above the RSO were contacted (the RSO was contacted in 8 of 13 inspections).

Authorized Users--This area had a noticeable discrepancy between the number of authorized users listed in the license or in the field notes and the number contacted by the inspectors, as indicated in the field notes. This discrepancy was particularly evident for medical-use licenses. For example, the notes for the inspection of 48-24533-01, a mobile nuc med license, indicated there were approximately 45 authorized users, of which none were contacted during the inspection; and the notes for the inspection of 13-03284-02, a hospital, indicated there were 9 authorized users, of which none were contacted during the inspection. For inspections of the non-medical licenses, at least one authorized user was contacted.

Performance-Based Inspection Techniques--The auditor observed a range from much to little indication in the field notes that performance-based techniques were used. Most of the checklist line items are not in performance-based terms, and unless the inspectors made use of the "remarks" sections of the field notes, it was not possible to conclude that performance-based techniques were used. For example, in the radiography inspections, the checklist item (Section 6c) on 3-month equipment checks was checked "Yes," but there were no statements in the remarks section indicating whether this was based on a review of records or on statements by the individuals who performed the checks, or if the inspector, in addition to reviewing records, had the licensee demonstrate performance of the check. Another example, in the medical inspections, is the checklist item (Section 21d) on comparison of the inspector's dose rate measurements to the licensee's measurements. There were no statements in the remarks section indicating whether the "Yes" was based on a comparison of the inspector's measurements with a previously documented

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survey or based on a side-by-side comparison with measurements made by the licensee worker who typically conducted the surveys. Similar comments are applicable for other checklist items such as moly breakthrough and package receipt, opening, and shipping.

In response to this audit, I would like to meet with you and the section chiefs to decide whether changes in the inspection program are necessary, given our resource constraints, to address the issue of the number of authorized users contacted during inspections and the time spent documenting inspection activities in the currently checklist-based, field notes.

ORIGINAL SIGNED BY W. L. AXELSON

W. L. Axelson, Director
Division of Radiation Safety and
Safeguards

Attachment: As stated

cc w/attachment:
J. B. Martin
H. J. Miller

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INSPECTION REPORTS REVIEWED

Computerized Medical Imaging, Inc., 48-24533-01, Nuclear Medical Van
Inspection--December 3, 1993, by D. Nelson. 591 issued. One violation.

Phillips Pipeline Company, 35-15582-01, Fixed gauge. Inspection--January 21,
1994 (initial inspection), by R. Hays. Clear 591.

Glitsch Field Services/NDE, Inc., 34-14071-01, Radiographer. Inspection--
November 18, 1993, by J. Cameron/M. Barry. Clear 591.

Ferris State University, 21-15237-01, Nuc Med teaching lab and Troxler gauge.
Inspection--October 1, 1993, by M. Mitchell. Clear letter.

Trans World Airlines, Inc., 24-05151-05, Radiographer. Inspection on
September 15, 1993, by M. Kurth, and on October 7, 1993, by R. Hays. Letter
with one violation and Clear 591, respectively.

Oberlin College, 34-05669-04, tracer isotope use. Inspection on Nov 15, 1993,
by M. Barry and J. Cameron. Clear 591 issued in the field.

Louisiana-Pacific Corporation, 24-26262-02, Fixed gauge. Inspection on
October 21, 1993, by D. Gibbons. Clear 591 issued in the field.

Reid Hospital and Health Care Services, 13-03284-02, Nuc Med. Inspection on
November 2, 1993, by K. Null. Letter and NOV issued. 13-03284-03,
Teletherapy. Inspection on October 28 - November 2, 1993, by K. Null. Letter
with no violations.

Professional Engineering Associates, Inc., 21-26476-01, Troxler gauge.
Inspection on November 4, 1993, by J. Jones. Clear 591.

Sacred Heart Hospital, 48-03116-01, Nuc Med. Inspection on December 1 - 20,
1993, by D. Nelson. Letter with 6 violations.

Methodist Hospital, 22-01519-02, Nuc Med. Inspection on December 15, 1993, by
M. Weber. Letter with 2 violations.