I hereby state that within 30 days the actions described by me to the inspector will be taken to correct the violations identified in the items checked above the NRC.

SIGNATURE - LICENSEE

DATE

T. FRANK PANTESPECTOR

4/19/89

8906090156) XA

# GUIDANCE FOR INSPECTION PROCEDURE 87100

# INDUSTRIAL RADIOGRAPHY INSPECTION FIELD NOTES

Inspection Report No. 89-01	License No. 04-14875-0
Director of Would Tachnical Source, has 23101 Follow Street  Howard, Odlifornia 74545	Docket No. <u>030-2-044</u> 3
Licensee Contact. K. Caill, 1250	Telephone No. 782-366e
Last Amendment No. 1	Date of Amendment. 2/21/89
Priority: I Program Code ( ) 03310 - Fix Date of Inspection 4/13/59	The state of the s
Type of Inspection ( ) Announced Unannounced  Next Inspection Date April, 1995 ( Norma	Initial Special Reinspection  ( ) Extended ( ) Reduced
Summary of Findings and Action:	
( ) No Noncompliance, Clear 591 issued	( ) Action on Previous N/C
(1) Noncompliance, 591 issued	( ) Regional Action
( ) HQ Action	
Personnel Contacted  ** R. Williamson, Passident  ** Caill, V.P. * RSO  * Those present at exit interview.	
Inspector J. Frank Pana (Signature)  Approved (Signature)	(Date Signed) (Date Signed)

Attachment 87100

Issue Date: 05/20/86

	٥.	Management Structure R. Williamson, Paux.	
		ic cail, U.P.	
		- radio queplans	
	b.	Administrative structure meets license requirements (4) Yes ( ) No [L/C] [34.11(e)]	
		Remarks.	
	c.	Individuals identified in the license as being responsible for the programs still hold those positions. ( Yes ( ) No Remarks.	
	d.	Radiography Personnel	
		Radiographers Radiographer's Assistants	
		There are currently seven indigreples and	
		(continue d., if needed, on paragraph 22.)	-
2.	INS	SPECTION HISTORY	
	a.	Item(s) of noncompliance or deviations noted during last inspetion conducted on 6/28/88 (4) Yes () No	ec-
		Corrected by letter dated NA	
	ь.	Requirement Severity Corrected Statu	15
		Record of survey of respect 5:4 TV C	-
		Special Form decumentation	-
		(continue b., if needed, on paragraph 22.)	
	c.	If any item(s) of noncompliance or deviations noted during last inspection were not corrected, explain.	it
		(continue c, if needed, on paragraph 22.)	

1. ORGAN'ZATIL

- 3. SCOPE OF PRODUCEM

  The because conducts activities under tooth a state and was

  Livinger. The because worked one day Ci/12/87) at hutter AFB

  4. TRAINING, RETRAINING AND SUPERVISION OF RADIOGRAPHY PERSONNEL Dives the Cost wasper
  - a. Radiographers and Assistants named in license. ( ) Yes ( No
  - b. Radiographer's Assistant under direct supervision of a Radiographer. (+) Yes () No [34.44] Remarks.
  - c. Approved training program. ( Yes ( ) No
  - d. Deficiencies noted. ( ) Yes ( → No [L/C] Remarks.
  - e. Training provided by. Consultant Tom Cutt borson
  - f. Written tests. (YYes ( ) No
  - g. Oral tests. ( Yes ( ) No
  - h. Radiographers completed field examination. [34.31)a)(4) and (b) (3)] (4) Yes () No
  - 1. Record of test results. ( Yes ( ) No [34.31(c)] Remarks.
  - j. Test results reviewed by NRC inspector. ( Yes ( ) No
  - k. Radjographer completed on-the-job training. [34.11(b)(3)] (+) Yes () No Remarks.
  - 1. Retraining program required by License Condition ( YYes ( ) No
  - m. Periodic training. (4 Yes () No
  - n. Retraining program implemented: ( Yes ( ) No [L/C] Remarks.
  - o. Records of retraining reviewed. (-1 Yes ( ) No

p. Instruction to workers in accordance with 19.12. (e) Yes ( ) No Remarks.

#### 5. INTERNAL AUDITS OR INSPECTIONS

- a. Audits or inspections conducted at 3-month intervals in accordance with 34.11(d). (4) Yes () No [L/C] Remarks.
- b. Records maintained. ( Yes ( ) No [L/C] Remarks.

#### INSPECTION AND MAINTENANCE OF DEVICES, CONTAINERS, AND CHANGERS 6.

- a. Included in Operating and Emergency Procedures. ( Y Yes ( ) No [34.32(j)] Remarks.
- b. Equipment check prior to use each day. ( Yes ( ) No [34.28(a)] Remarks.
- c. Equipment check at 3-month intervals. ( Yes ( ) No [34.28(b)] Remarks. A Techop. SN 2313 had a quant maintainer due 3/30/59 and had not yet have done . However aires it is not being used under the size lieune this was not extend as a viction.

  d. Record of results maintained. (1) Yes () No [34.28(b)]
- Remarks.

#### 7. NRC REGULATIONS, LICENSE AND OPERATING AND EMERGENCY PROCEDURES

- a. Parts 19, 20, and 34; the license; and Operating and Emergency Procedures furnished to all radiographers and radiographer's assistants. (4) Yes ( ) No [34.31(a)(2)] Remarks.
- b. Operating and Emergency Procedures approved by NRC. [34.11(c)] (1) Yes ( ) No

8.	UTI	LI	ZAT	ION	LUG

- a. Utilization log maintained. (1) Yes ( ) No [34.27] Remarks.
- Utilization log contains all required information. (V) Yes
   ( ) No [34.27(a),(b),(c)]
   Remarks.

#### 9. QUARTERLY INVENTORIES

- a. Quarterly physical inventories conducted. ( Yes ( ) No [34.26] Remarks.
- b. Quarterly inventories contain all information. ( Yes ( ) No [34.26] Remarks.
- c. Materials possessed authorized by the license. ( Yes ( ) No Remarks.
- d. Byproduct Material inventory on.

  Source
  Changer
  Model # Quantity Isotope Source S/N Camera Model S/N

  Camera Model S/N

  Tech Op: 660
- e. Procurement and use of byproduct material in accordance with license requirements. ( Yes ( ) No [L/C] Remarks.

## 10. MATERIALS, FACILITIES AND EQUIPMENT

- a. Fixed Facility.
  - 1) As described in application dated Saptity 1987, Report dated Jan 34, 1989, or

- (a). cell(s) interlocked [20.203(c)(.,(1)] ( ) Yes ( ) No
- (b). Cell(s) controlled in accorance with 20.203(c)(2)(11) or (iii). [34.29(b)] (+) Yes () No Remarks.

Fixed facility is under the State of California lions

(2) Entrance controlled in accordance with 20.203(c)(2).
(+) Yes () No [20.203(c)(2)]
Remarks.

Under Oalif license

(3) Exit in accordance with 20.203(c)(3). (4) Yes ( ) No [20.203(c)(3)] Remarks.

Under Calif. Licane

(4) Surveillance or locked to prevent unauthorized entry. (4) Yes () No [20.203(c)(4), 34.41] Remarks.

Under Calif Ciango

(5) Visible and audible signals to warn of the presence of radiation: (4) Yes () No [34.29(b)]
(a) Alarms operated correctly; i.e., visible due to radiation; audible when entrance attempted during source exposure. [34.29(b)]
Remarks.

Under Calif Vicense

(6) Alarm system tested at 3 month intervals. (4 Yes ( ) No [34.29(c)] Remarks.

Under Calif. Vienes

(7) Record of slarm system test. ( ) Yes ( ) No [34.29(c)] Remarks.

Under Calif lieuse.

- (8) Radiographic exposure devices and storage containers meet radiation level limits of 34.21. ( → Yes ( ) No [34.21] Remarks.
- b. Storage Area.
  - (1) Sources locked in device. ( Yes ( ) No [34.22(a)] Remarks.

(2) Storage devices meet radiation levels (, Yes () No [34.21] Remarks.

(3) Devices secured to prevent unauthorized removal from an unrestricted area. (, Yes () No [20.207] Remarks.

c. Field Location

(1) Field work authorized. (, Yes () No [L/C] Remarks.

(2) Field inspection conducted. () Yes () No (3) Proper postings (signs) ropes, etc., available as required by regulations or license. () Yes () No

According to the RSO, The proper postings are unde.

d. Survey Meters

Remarks.

- (1) Calibrated and operable meters available and used:
  (2) Yes () No [34.43(c)]
  Remarks.
- (2) Type and number available.
- (3) 2 mR/hr through 1 R/hr can be measured. ( Yes ( ) No [34.24] Remarks.
- (4) Calibrated by hiding trial Nuclear
- (5) Calibration method authorized. (4 Yes ( ) No [L/C] Remarks.
- (6) Calibrated at 3-month intervals. (4) Yes ( ) No [34.24] Remarks.

Issue Date: 05/20/86

Remarks. you. PERSONNEL MONITORING 11. Film or TLD badge supplier. Redulin Tologrequency handly [L/C] à. Reports reviewed by: RSD b. Frequency: humility NRC inspector reviewed personnel monitoring records for C. period Tune, 1989 to Feb 1989 License exposure limit. 1.25 R/Quarter 3 R/Quarter e. NRC forms or equivalent. (1) NRC-4. ( ) Yes ( 4 No Complete.\* ( ) Yes ( 4 No \* Must be completed before individuals receive more than 1.25 rems per calendar quarter. (2) NRC-5. (+) Yes ( ) No Complete. (+) Yes ( ) No [20.401(a)] f. Maximum quarterty exposure. 23% wen Average. g. Each individual assigned film badge and dosimeter. ( Yes ( ) No [34.33(a)] Pemarks. h. Dosimeter type. Range. c - zwo www. 1. Annual check of dosimeter for correct response. ( Yes ( ) No [34.33(c)] Remarks. Dosimeter recharged at start of each shift. ( Yes ( ) No [34.33(a)] Remarks.

e. Specia Equipment (shields, collimator, etc.)

Remarks.

k. Dosimeter dose recorded daily. (7 Yes ( ) No [34.33(b)]

12. LEAK TES	212
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- a. Leak test method approved. ( Yes ( ) No [34.25(c)] Remarks.
- b. Model of leak test kit. Dome by lub. Nue Corp. in Son Lander.
- c. Test at 6-month intervals. (LY Yes ( ) No [34.25(b)] Remarks.
- d. Record of leak test results maintained. ( Y Yes ( ) No [34.25(c)]
- e. Records reviewed by NRC inspector for period Tung to Feb. 1989 Remarks.

#### 13. SURVEYS

- a. Area of facility survey conducted to show compliance with 20.105. (\*) Yes () No [20.201(b)] Remarks.
- b. Area of facility survey recorded. (Y Yes ( ) No [20.401(b)] Remarks.
- c. NRC inspector reviewed records for period \_\_\_\_\_\_ to \_\_\_\_ N.A.
- Maximum radiation levels in unrestricted areas. Remarks.

"O" uneur

- e. Survey after each exposure: ( Yes () No [34.43(b)] Remarks.
- f. Survey includes guide tube. ( Yes ( ) No [34.43(b)] Remarks.
- g. Record of final survey before securing device at place-ofstorage. () Yes (4) No Remarks.

\*\*

The I course conducts the servey but did not record it.

Issue Date: 05/20/86

#### 14. POSTING AND LABELING

- a. High Radiation Area posted as required. ( Yes ( ) No [20.203(c)(1)] Remarks.
- b. Radiation Area posted as required. ( Yes ( ) No [20.203(b)] Remarks.
- c. Use or storage area posted "Caution Radioactive Material". (Y) Yes () No [20.203(e)(1)] Remarks.
- d. Containers or devices properly labeled. (YYes () No [20.203(f)] Remarks.
- e. Posting of "Notice to Workers". ( Yes ( ) No [19.11(a) or (b)] Remarks.
- f. Posting of "Notice to Employees". ( Yes ( ) No [19.11(c)] Remarks.

## 15. CONFIRMATORY MEASUREMENTS

- a. Confirmatory measurements made by inspector. ( ) Yes ( ) No
- b. Survey instrument. Xelex 345B NRC Serial No. 35519

  Last date of calibration. 2/2/89
- c. Describe type and results of measurements and compare these with licensee's measurements. As reduction survey was conducted of the Common strongs were and of source common. No absurbal Asignation to reduct were noted

## 16. RECEIVING AND SHIPPING OF RADIOACTIVE MATERIALS

 Propedures for picking up, receiving, and opening of packages.
 ( Yes ( ) No [20.205] Remarks.

			ten biocconicai (s) ies ( ) iii		/	
	c.	Ship	ping incidents since last inspect	ton. ( ) Ye	s (Y No	
	d.	Surv	ey of packages when received. ( v) rks.	Yes ( ) No	[20.205	(c)(1)]
	e.	Reco	ord of survey of packages. ( X Yes	( ) No [	20.401(b)]	
	f.	Ship	oment of sources since last inspec	tion. (V	Yes ( ) No	
		(1)	Only container authorized by 110 (1) Yes () No Remarks.  The Leaves and transports of the leaves and transports of		and.	Lucia
		(2)	Shipping papers and package labe (1) Yes () No [71.5] Remarks.	ling prope	rly comple	ted.
		(3)	Licensed material transferred in ( Yes ( ) No Remarks.	n accordanc	e with [30	.41).
		(4)	Record of receiot and transfer. Remarks.	(YYes (	) No [30.	51]
17.	TR	AN3PO	RTATION (10 CFR 71.5a and 49 CFR	171-178		
				Yes	N/A	V10.
	8.	Suc	ensee makes shipments of RAM? h shipments &re: delivered to Common Carriers? transported in licensee's own vehicle as private carrier?	(4)	()	(),
	If	a. a	both? bove is "Yes," complete following	items:		
	b.	[17	Authorized Packages used? 3.415-416] es used:	W	()	( )
		DOT	-7A, Type A [173.415] formance test records on file? -55 [173.416(a)]	( )	14	()

	LI	censee aware of 6/30/85 Cutoff			
. (		) Certified [173.416(b)]	()	18	()
		Registered with NRC as user?	(M)	()	()
		[71.12(c)(3)] Documented NRC-Approved Q/A program?	14	()	()
1.		NRC Q/A Approval No.	(4	()	()
10	× 10	) Other	sections of	of the new	mence Locuments
/	c.	Special Form Material Performance test & records available for each source design [173.476(a)]	of the in	e net au	which at the time
	d.	Packages labeled as required?	14	( )	( )
		[172.403(a)(b)(c)(e)(f) ( ) Excepted ( ) WI ( ) YII ( ) YIII	(1)	( )	( )
		Surveys performed to select correct labor	(1)	( )	()
		category and compliance with radiation limits? (175.475(i).	(3)	()	()
	е.	Packages marked with required, i.e., proper shipping name, Spec. No., COC No., etc. [172.300 thru 172.310)]	15	()	( )
	f.	Shipping papers prepared for each shipments? [172.200] Such papers contain required informa-	14	()	()
		tion [172.203(d)]	(4	(;	()
	9.	For licensee Private Carrier Shipments: Vehicles placarded as required?			
		[172.500, 172.504] Cargo blocked, braced, tied down in	()	(1)	()(YI)
		Any incidents reported to DOT?	W	()	()
		[1/1.15-16]	( )	14	()
	h.	Licensee carries shipping papers that are readily accessible when transporting RAM.	( )	()	()
	18.	NOTIFICATION AND REPORTS			
		a. Licensee in compliance with 19.13 (repo () Yes () No [19.13] Remarks.	orts to inc	dividuals).	
		b. Licensee in compliance with 20 405 /			

Licensee in compliance with 20.405 (overexposures).
 () Yes () No [20.405(a)]
 Remarks.

N.A.

- C. Licensee in complicance with 20.403 (incidents). () Yes () No [20.403] Remarks.
- d. Licensee in compliance with 20.402 (theft or loss).
  () Yes () No [20.402(a)] or [20.402(b)]
  Remarks.

e. Annual Report to Commission. () Yes (1) No [20.407]

Remarks.

At the time of the inspection, the license had not part

its 1988 annual report to the Commission.

F. Termination Report to Commission. () Yes () No [20.408]

Remarks.

N. A.

#### 19. LICENSE CONDITIONS

- a. All License Conditions reviewed during inspection. ( Yes
- b. Activities were conducted in accordance with License Conditions except as noted elsewhere in this report. ( Yes ( ) No Remarks.

## 20. BULLETINS AND INFORMATION NOTICES

- a. Bulletins and Information Notices issued during current year.
   Yes () No
- Bulletins and Information Notices received by licensee. ( ) Yes
   ( ) No
- c. Licensee took appropriate action in response to Builetins and Information Notices. ( ) Yes ( ) No Remarks.

#### 21. ITEMS OF NONCOMPLIANCE

Are Appardix A

22. CONTINUATION OF PREVIOUS PARAGRAPHS - USE BACK OF PAGE IF NECESSARY

13

INSPECTION	REPORT	NUMBER	8-	01		
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		400	THE PERSONNEL .		men	<b>Harris</b>	-

# APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: Q.C.	Samuel License no: 04-1487
Reference	Basis for noncompliance
Report Item 13 g.  10 CFR 34.43 (c)  Lic Cond  Type n/c 32 7	Records of the final storage servings conducted and not bear maintained.
Report item 18.e  10 CFR 20.407  Lic Cond  Type n/c S.L T	I had not sout its 1988 annual report to the Commission.
Report item 17 b.  10 CFR 71.12 (c)(1)  Lic Cond  Type n/c S L T	At the time of the inspection, the seathers of the reference documents to the Contributes of V Compliance relating to the use of wrinterence were not available.
Report item  IO CFR  ic Cond  Type n/c	
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Regulatory Commissions (NRC) rules and regulation representative records, interviews, with person 1. Within the scope of this inspection, no violation 2. The inspector also verified the steps you had those actions at this time.  3. During this inspection rectain of your activity THIS IS A NOTICE OF VIOLATION which of a	nnel, and observetions by the etions were observed.  Ive taken to correct the violation ities, as checked below, were	inspector. The find	requirements.  CFR 19.11.  was not properly	pection are as follows:
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License No.: 04-14875-62-Docket No.: 030-20443

# PERFORMANCE EVALUATION FACTORS

******	failure of Isotope Committee (or certain key members thereof) to meet or discuss meaningful issues for a Broad Scope type license.
-	RSO too busy with other assignments (RSO spending less than 25% of time)
-	Excessive customer complaints from major manufacturers or distributors.
	Excessive al'egations which have been substantiated.
	Significant number of diagnostic misadministrations (greater than 10-3 per procedure).
	High man-rem levels (greater than 50% of workers requiring NRC Form 4).
	Frequent or excessive contamination within the restricted area (greater than 10 x NMSS guidance for release to unrestricted areas).
	Excessive missed surveillances (leak testing, inventory, surveys, etc., greater than 50% per year).
	Financial instability of licensee (shoe string operations, one or two-man operation such that cost of cleanup is significant to continued operations of the facility).
	Lack of involvement of senior management to oversee kou performance (management unaware of operations).
	Inadequate consultant service (consultant not finding any problems but NRC does).
-	Radiation Safety Committee (Broad Scope) gives "rubber stamp" approvals to users and/or issues user permits for indefinite periods of time.
MICH. SERVICE	Insufficient technologist/authorized user/radiation safety staffing for licensed program workload.
concert at	Excessive numbers of repeat violations (three or more).
—	Frequent internal uptakes greater than 125 mrems, whole body equivalent but less than 520 MPC/hr limits.
$\checkmark$	Failure to follow approved procedures.
	Program not being audited by management or the Radiation Safety Committee.
V	Users not familiar with safety procedures or license conditions.

ACTIO	NS TAKEN
******** *	Notice of Violation Letter with Severity Levels III, IV, V
	NKC form 591 Clear, Violations 3.
	Telephone Call to Licensee
	Management Meeting with Licensee
	Enforcement Conference with Licensee
ALCO CONTRACTOR	Escalated Enforcement (Civil Penalty)
	Early reinspection required. Date
INSPE	CTOR'S COMMENTS
	Overall, the licensee conducte a good vadiation sufery

Inspector &

Inspection Date

Section Chief

Date