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. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

the NAG.

SIGNATURE - LICENSEE

9007060282

DATE

J. FRANK PANGESPECTOR

6/20/90

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Type of License: Rading apply
Licensee: Part Lapartin &

License No .: 04-24052 -1

Docket No.: 030-19687

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)
 Lack of involvement of senior management to oversee RSO performance (management unaware of operations).
 Inadequate consultant service (consultant not finding any problems but
Insufficient technologist/authorized user/radiation safety staffing for licensed program workload.
Program not being audited by management or the Radiation Safety

British Company	Notice of Violation Letter with Severity Levels III, IV, V
V	NRC Form 591 Clear Violations
Section 1988	Telephone Call to Licensee
Francisco	Management Meeting with Licensee
	Enforcement Conference with Licensee
-	Escalated Enforcement (Civil Penalty)
	Early reinspection required. Date
	CTOR'S COMMENTS

done under this conse to date to make a definitive constitution.

Inspector &

Inspection Date

Section Chief

Date (28/90)

REGION V

Report No. 90-01
Docket No. 030-17744 License No. 04-19467-01
Safeguards Group Priority / Category 33 20
Licensee: Smith-Emery Co 181 E. Washington Blud
LOS Angeles, CA 90021
Facility Name: 5m. M. Emery Co
Inspection at: Hunters Pt & LA, CA
Inspection conducted: 29 Mar & 2 Apr 90
Inspectors: Faul R Zuakowski 18 Apr 90 Dete
Approved by: A Date
4/2890
Summary: Inspection of Mar 29 & Apr 2, 1990 (Report 30/7744/90-01)
Aves Inspected: Module 30703, Management Meetings;
Module 87100, Materials Inspection Program; Module
92763, Bulletin Followup; Hodule 92702 Follows
on Previous Violations; Module 86740, Transportation
92763, Bulletin Followup; Hodule 92702, Followp on Previous Violations; Madule 86740, Transportation; Mudule 83822, Radiation Protection.
Results: of the areas inspected there were
two violations of NRC Regulations. Paragraphs
. 186418191 should be consulted for more
in formation.

GUIDANCE FOR INSPECTION PROCEDURE 87100

INDUSTRIAL RADIOGRAPHY INSPECTION FIELD NOTES

Inspection Report No. 90-01	License No. 07-19467-01
Licensee (name and address)	Pecket No. 030-17744
Sm. th Emery Co.	
Ws Angeles, CA 9002-1	
Licensee Contact. Hr. Judson Moore, RSZ	Telephone No. 1415/822-8880
Last Amendment No. 3	Date of Amendment. June 16, 1985
Priority: 1 Program Code () 03310 - Fix	ed (O3320 - Temporary
Date of Inspection 29 Mars 2 Apr 9	
Type of Inspection () Announced Unannounced Next Inspection Date <u>Mar 90</u> (Y Norma	Initial Special Reinspection
Next Inspection Date Mar 90 (4 Norma	1 () 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 Mr. Judson Moure R50 Hr. George Bettey III, VP	
* Those present at exit interview. * Mr. Juds on Moore, R50 * Mr. George Battet, V. P. (Mr Inspector Tank R. Junkowski Approved (Signature)	James Partridge, V. P. on sick leave dy of Inspection) (Date Signed) (Date Signed) (Date Signed)

Issue Date: 05/20/86

	Management Structure see packe page
	The management structure appears of adequate for the size of the program
b.	Administrative structure meets license requirements. (+) Yes () No [L/C] [34.11(e)] Remarks.
с.	Individuals identified in the license as being responsible for the programs still hold those positions. (Tyes () No Remarks. RSO no not changed. However, Mr. D.
d.	left in Dac, 1989. The gray am was stopped significant seek in July, 1989. Radiography Personnel
	Radiographers Radiographer's Assistants
	Judsen Moure mome
	(continue d., if needed, on paragraph 22.)
INS	PECTION HISTORY
empress.	
empress.	PECTION HISTORY
a .	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1987 (4 Yes () No
a. b.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1989 (4 Yes () No Corrected by letter dated
a. b.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1987 (4 Yes () No Corrected by letter dated Requirement Severity Corrected Status
a. b.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1987 (4 Yes () No Corrected by letter dated Requirement Severity Corrected Status
a. b.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1987 (4 Yes () No Corrected by letter dated Requirement Severity Corrected Status
a. b.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 Ppl 1989 (4 Yes () No Corrected by letter dated Requirement Severity Corrected Status (Continue b., if needed, on paragraph 22.) If any item(s) of noncompliance or deviations noted during last inspection were not corrected, explain.
a.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 April 1989 (4 Yes (1) No Corrected by letter dated Requirement Severity Corrected Status (Continue b., if needed, on paragraph 22.) If any item(s) of noncompliance or deviations noted during last
a.	Item(s) of noncompliance or deviations noted during last inspection conducted on 13 Ppl 1989 (4 Yes () No Corrected by letter dated Requirement Severity Corrected Status (Continue b., if needed, on paragraph 22.) If any item(s) of noncompliance or deviations noted during last inspection were not corrected, explain.

1. ORGANIZATION



3. SCOPE OF PROGRAM The program has been terminated and the agreement sold to an authorized person. The prior to expiration muste their lieuse one month TRAINING, RETRAINING AND SUPERVISION OF RADIOGRAPHY PERSONNEL

- a. Radiographers and Assistants named in license. () Yes () No
- b. Radiographer's Assistant under direct supervision of a Radio-(Yes () No [34.44] grapher. Remarks.

Except there is only one left that and

- c. Approved training program. (Yes () No
- d. Deficiencies noted. () Yes () No [L/C] Remarks.
- e. Training provided by. Tom Coth horson, Consultant.
- f. Written tests. (4) Yes () No
- g. Oral tests. (C) Yes () No
- h. Radiographers completed field examination. [34.31)a)(4) and (b) (3)] (L'Yes () No
- 1. Record of test results. (Yes () No [34,31(c)]
- j. Test results reviewed by NRC inspector. (4) Yes () No
- k. Radiographer completed on-the-job training. [34.11(b)(3)] () Yes () No Remarks. There have been no new rode graphers sivel the last inspection
- 1. Retraining program required by License Condition. (9 Tes () No
- m. Periodic training. (Yes () No
- n. Retraining program implemented: (TYes () No [L/C] no need to continue with the returning program The program is in limbe

o. Records of retraining reviewed. (Yes () No

p. Instruction to workers in accordance with 19.12.

(4) Yes

(9) No

Remarks.

5. INTERNAL AUDITS OR INSPECTIONS

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

Pron to Suly 1889 when reducingty was there

b. Records mainta ned. (4) Yes () No [L/C] Remarks.

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

- a. Included in Operating and Emergency Procedures.

 () 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. (LY Yes () No [34.28(b)] Remarks.
- d. Record of results maintained. (4) Yes () No [34.28(b)] Remarks.

7. NRC REGULATIONS, LICENSE AND OPERATING AND EMERGENCY PROCEDURES

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

8.	UT1	111	TAS	ION	LOG
W. 7	Alexander .		to minimum into	riantació/mener	HORSON PARTICIPATION

- a. Utilization log maintained. (4 Yes () No [34.27] Remarks.
- b. Utilization log contains all required information. + Yes () No [34.27(a),(b),(c)] Remarks.

QUARTERLY INVENIORIES 9.

- Quarterly physical inventories conducted. (4) Yes () No Remarks.
- b. Quarterly inventories contain all information. () Yes () No Remarks.
- c. Materials possessed authorized by the license. (4 Yes () No Remarks.
- d. Byproduct Material inventory on. May 5, 1989 & 1/4 12, 1989 Source Changer Quantity Isotope Source S/N Camera Model Model # 660 2896 Some Transferred to Industrial Nuclear 660 2841

640

Issue Date: 05/20/86

2522

Inspector, 10, 198 9 (Records chertas by Procurement and use of byproduct material in accordance with license requirements. () Yes () No [L/C] Remarks.

MATERIALS, FACILITIES AND EQUIPMENT 10.

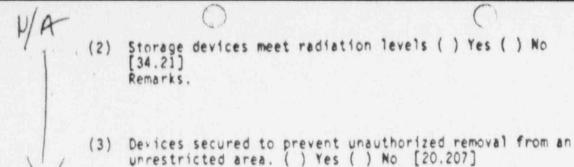
a. Fixed Facility.

As described in application dated 10/13/80, Report dated _____, or _

(8) Radiographic exposure devices and storage containers meet radiation level limits of 34.21. () Yes () No [34.21] Remarks.

1. Storage Area.

(1) Sources locked in device. () Yes () No [34.22(a)] Remarks.



c. Field Location

Ramarks.

- (1) Field work authorized. (4) Yes () No [L/C] Remarks.
- (2) Field inspection conducted. () Yes () No
- (3) Proper postings (signs) ropes, etc., available as required by regulations or license. (Lives () No Remarks.

 Were used prior in inactivation
- d. Survey Meters
 - (1) Calibrated and operable meters available and used:

 (if Yes () No [34.43(c)]

 Remarks.

 Were Calibrated prior to inactivation

 of facility
 - (2) Type and number available.

Remarks.

(3) 2 mR/hr through 1 R/hr can be measured. (4 Yes () No [34.24]

- (4) callbrated by . were cal brated by Industrial Nuclear
- (5) Calibration method authorized. (4 Yes () No [L/C] Remarks.
- (6) Calibrated at 3-month intervals. (Lyes () No [34.24] Remarks. pure to in activation of facility

	e. Special Equipment (shields, collimators, etc.)
11.0	Describe
	were used given to martination of Jacility - equipment sold in July 1989
11.	PERSONNEL MONITORING
8.	Film or TLD badge supplier. O Frequency munthly [L/C]
b.	Reports reviewed by: RSO Frequency: months
с.	NRC inspector reviewed personnel monitoring respons for period Apr 1989 to Han 1999
d.	License exposure limit. 1.25 R/Quarter 3 R/Quarter
	e. HRC forms or equivalent.
	(1) NRC-4. (4) Yes () No Complete.* () Yes () 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 quarterly exposure. 205 Average. 40
	g. Each individual assigned film badge and dosimeter. () Yes () No [34.33(a)] Remarks.
	h. Dosimeter type. Victoreen Range. 0-200 mmen
	 Annual check of dosimeter for correct response. (*) Yes () No [34.33(c)] Remarks.
	j. Dosimeter recharged at start of each shift. (Yes () No [34.33(a)] Remarks.
	t. Dosimeter dose recorded daily. () Yes () No [34.33(b)] Remarks.

12. LEAK TESTS

- a. Leak test method approved. (Y Yes () No [34.25(c)] Remarks.
- b. Model of leak test kit. supplied by belieful Nuclean
- c. Test at 6-month intervals. () Yes () No [34.25(b)] Remarks.
- d. Record of leak test results maintained. () Yes () No [34.25(c)]
- e. Records reviewed by NRC inspector for period Apr 89 to Man 90 Remarks.

remis acceptable

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. (Yes () No [20.401(b)] Remarks.
- c. NRC inspector reviewed records for period Apr 89 to Ma 90
- d. Maximum radiation levels in unrestricted areas.
 Remarks.
- e. Survey after each exposure: () Yes () No [34.43(b)] Remarks.
- f. Survey includes guide tube. (TYes () No [34.43(b)] Remarks.
- g. Record of final survey before securing device at place-ofstorage. (Yes () No Remarks.

14. POSTING AND LABELING

- a. High Radiation Area posted as required. (Yes () No [20.203(c)(1)] Remarks.
- b. Radiation Area posted as required. (A Yes () No [20.203(b)] Remarks.
- c. Use or storage area posted "Caution Radioactive Material".

 (1) Yes () No [20.203(e)(1)]

 Remarks.
- d. Containers or devices properly labeled. (Yes () 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 Leaves such comments of 1789, Sources returned to John NRC Serial No.

 Last date of calibration.
- c. Describe type and results of measurements and compare these with licensee's measurements.

16. RECEIVING AND SHIPPING OF RADIOACTIVE MATERIALS

a. Procedures for picking up, receiving, and opening of packages.

(Yes () No [20.205]

Remarks.

	D	Mult	ten procedures. (*) tes () h	0			
	с.	Ship	ping incidents since last ins	pection. () Ye	s (TNO		
	d.	Surve	ey of packages when received. rks.	(6) Yes () No	[20.205]	(c)(1)]	
	е.	Reco Rema	rd of survey of packages. ()	Yes () No [2	0. 4 01(b)]		
	f.	Ship	ment of sources since last i	nspection. (47	es () No		
		(1)	Only container authorized by () Yes () No Remarks.	y licensee has b	een used.		
		(2)	Shipping papers and package (Yes () No [71.5] Remarks.	labeling proper	ly comple	ted.	
		(3)	Licensed material transferr (Yes () No Remarks.	ed in accordance	with [30	.41].	
		(4)	Record of receipt and trans Remarks. Sources transfers Camera S 5 old to	o to Indust	vial Nu	clervionzy	
17.	TR	ANSPO	RTATION (10 CFR 71.5a and 49				
				Yes	N/A	V10.	
	a.	Suc ()	ensee makes shipments of RAM? h shipments are: delivered to Common Carriers transported in licensee's or vehicle as private carrier?	?	()	().	
	11	a. a	both? bove is "Yes," complete follo	owing items:			
	ь.	[17	Authorized Packages used? 73.415-416] Ses used:	(4)	()	()	
		Per	r-7A, Type A [173.415] rformance test records on file r-55 [173.416(a)]	e? (4)	()	()	

	Licensee aware of 6/30/85 Cutoff on use?			/
	() Certified [173.416/b)]	()	15	()
	Registered with NRC as user?	19	()	()
	[71.12(c)(3)] Documented NRC-Approved Q/A program?	14	()	()
	[71.12(b)] NRC Q/A Approval No. 71-314 () Other	14	()	()
c.	Special Form Material Performance test records available for each source design			
	[(6)]	W	()	()
d.	Packages labeled as required? [172.403(a)(b)(c)(e)(f)	14	()	()
	() Excepted () WI () YII () YIII Surveys performed to select correct label	14	()	()
	category and compliance with radiation limits? (175.475(i).	14	()	()
e.	Packages marked with required, i.e., proper shipping name, Spec. No., COC No., etc. [172.300 thru 172.310)]	18	()	
4.	Shipping papers prepared for each shipments? [172.200] Such papers contain required informa-	14	()	()
	tion [172.203(d)]	14	()	()
9.	For licensee Private Carrier Shipments: Vehicles placarded as required? [172.500, 172.504]			
	Cargo blocked, braced, tied down in	(4)	()	()
	Any incidents reported to DOT?	14	(,)	()
	[1/1.15-16]	()	14	()
h.	Licensee carries shipping papers that are readily accessible when transporting RAM.	19	()	()
18.	NOTIFICATION AND REPORTS			
	a. Licensee in compliance with 19.13 (repo () Yes (1) No [19.13] Remarks.			
	b. Licensee in compliance with 20.405 (over Remarks.	exposures	neces.	and I

Issue Date: 05/20/86

c.	Licensee (Yes Remarks.	in compl	icance with [20.403]	20.403	(incidents).
----	-------------------------------	----------	----------------------	--------	--------------

- 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. (L) Yes () No [20.407] Remarks.

1. Termination Report to Commission. () Yes (4No [20.408]

Remarks.

Dud not sand Termination Report to Communication

for Robert Scott Terminated on 21 Oct 89.

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. (4) Yes () No Remarks.

20. BULLETINS AND INFORMATION NOTICES

- a. bulletins and Information Notices issued during current year.
 () Yes () No
- b. Bulletins and Information Notices received by licensee. (4) Yes () No
- c. Licensee took appropriate aetTon in response to Bulletins and Information Notices. (*) Yes (*) No Remarks.

21. ITEMS OF NONCOMPLIANCE

See 18 (a) & (f)

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

Report No.: 90-01

Type of License: Industrial

Licensee: Smith Emergy Co

Los Angeles

License No.: 04-19 467-01

Docket No.: <u>636-17744</u>

PERFORMANCE EVALUATION FACTORS

***	discuss meaningful issues for a Broad Scope type license.
	RSC too busy with other assignments (RSO spending less than 25% of time).
	Lack of involvement of senior management to oversee RSO performance (management unaware of operations).
	Inadequate consultant service (consultant not finding any problems but NRC does).
	Insufficient technologist/authorized user/radiation safety staffing for licensed program workload.
	Program not being audited by management or the Radiation Safety Committee.

ACTIONS TAKEN
Notice of Violation Letter with Severity Levels III, IV
NRC Form 591 Clear, Violations
Telephone Call to Licensee
Management Meeting with Licensee
Enforcement Conference with Licensee
Escalated Enforcement (Civil Penalty)
Early reinspection required. Date
INSPECTOR'S COMMENTS
This licensee has sold all radiographic carrier
have transferred all somes to industrial No
- The sources were transferred on 10 May 89. The
cameras were sold on 12 July 89. The hears is planning to terminate. Their heave one month prior to its expiration.
= 0R 2 b . L.

Inspector Junakowska 29 Mar & 2 April 90 Inspection Date

Section Chief

Date