

RECEIVED
NRC
REGION V

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301 90 APR 20 P1: 55

(805) 631-1812

April 17, 1990

United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

SUBJECT: INSPECTION REPORT NO. ¹⁵⁰⁰⁰⁰⁴ ~~99990005~~/90-01

Dear Sirs:

In reply to your letter dated March 5, 1990 regarding eleven apparent violations B & B X-Ray and Inspection would like to offer the following clarifications and rebuttals.

Four of the apparent violations were solely incurred by Mr. Spencer Bechtel. The violations included failing to secure the source in the shielded position (A), incomplete radiation surveys (B), failure to post "Caution High Radiation Area" signs properly (F), and failure to correctly fill out transport papers required by the D.O.T. (H).

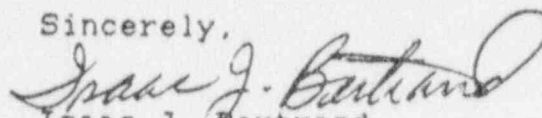
Three of the apparent violations were the responsibility of the management of B & B. These violations included the outer enclosure not being correctly labeled (I), not having an N.R.C. approved Quality Assurance Manual (J), and not being a registered user with the N.R.C. of radioactive materials (K).

Two of the violations were the responsibility of the acting Radiographer. These apparent violations included the failure to record exposure device readings (C), and the failure to record pocket dosimeter readings (D).

Two of the apparent violations B & B believes to be unfounded. The records of transfer for all cameras were admittedly intact (E) and, the posting of form NRC-3 ("Notice to Employees") is disputable as to compliance

A detailed report on each apparent violation follows.

Sincerely,


Isaac J. Bertrand
Radiation Safety Officer

IJB:jsa

Enc.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violations.

As listed in Condition 13 of the State of California License number 5368-15 the department regulations shall govern unless the statements, representations, and procedures in the application and correspondence are more restrictive than the regulations.

The Quality Assurance Manual provided to the State by B & B X-Ray is more restrictive than the regulations provided for by the State with the exception of Condition 24 which lists section 30373 of the California Radiation Control Regulations in regards to transportation of licensed materials. Section 30373 lists 10 CFR, Part 71 insofar as such regulations relate to the packaging, loading and labeling of radioactive materials.

This report will list B & B's QAM as a reference with the exception of apparent transport violations which will refer to 10 CFR and or 49 CFR as applicable.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "A".

During radiographic operations on February 2, 1990 at Vandenberg AFB SLC 4 East, Radiographer Spencer Bechtel was observed failing to secure a radiographic exposure device properly between exposures as required by 10 CFR 34.22(a), Condition No. 13 of State License No. 5368-15, and BBXR Quality Assurance Manual Section II paragraph 2.19.6 which reads as follows:

2.19 GAMMA INDUSTRIAL GAMMA CENTURY S & SA

2.19.6 Operation

1. Have an operating survey meter on hand always and use it.
2. Remove the lock box safety cap from the lock box assembly thereby exposing the pigtail connector.
3. Crank the control cable to a length of about six inches.
4. Connect control cable to pigtail.
5. Crank control cable so that male connecting thread can be screwed into lock box.
6. Screw connecting thread into lock box.
7. Remove safety plug from protruding nipple located approximately one inch from top of unit.
8. Connect source tube. (Place Collimator at end of guide tube if possible).
9. Place free end of source tube in desired position trying to keep it in a straight line with out kinks.
10. Stretch control cable out from exposure device in as straight a line as possible.
11. Unlock the unit by turning the handle back (counter-clockwise) which will permit the key to be turned. This is required only on the SA model.
12. Crank source out as smoothly as possible. When you feel that source is approaching end of source tube, slow the turning speed so that pigtail does not strike the end of the source tube with undue force.
13. Survey to see that radiation levels are within limits.
14. At the end of exposure, retract the source into unit.
15. Survey carefully to be sure that source has returned to safe position.
16. Turn crank back (counter clockwise) and depress lock plunger. Only the SA models require that the handle be pulled back.
17. Disconnect cable.
18. Screw safety cap into place.
19. Disconnect source tube.
20. Insert safety plug.

Line 16 clearly requires that the source must be secured by depressing the plunger after the exposure is complete.

Isaac Bertrand the Radiation Safety Officer for B & B X-Ray and

Inspection was unaware that Mr. Bechtel was operating the exposure device incorrectly. During previous unannounced field inspections conducted by Mr. Bertrand, Mr. Bechtel was observed to have operated the device in the appropriate and required manner.

B & B realizes the severity of this type of violation due to the potential for over exposure to the operator of the device. Disciplinary and corrective actions have been taken to ensure that the likelihood of this event occurring again is deminished.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "B".

The inspector observed that the exposure device was improperly surveyed throughout the duration of the field audit at VAFB. Violation "B" was the direct result of Mr. Bechtel failing to follow the procedures listed in B & B's QAM Section II and Section X which read as follows:

2.8 PHYSICAL RADIATION SURVEY OF DEVICE AFTER EACH EXPOSURE

2.8.1 Return source to device.

2.8.2 Approach device using survey meter and check source guide tube and surface of device for excessive radiation.

2.8.3 After determining the source is in a safe position in device from meter reading, lock the device, continue with work or secure device if completed with work in this area.

10.1.2 Perform physical radiation survey as follows:

To perform physical survey of device be sure survey meter is in operable condition. Survey the surface of device to see if radiation levels are adequate for handling the device. Use survey meter to take readings at 6" from the device, radiation levels should drop indicating the source is shielded. After determining that the source is in the safe position inside the device, from survey meter reading, lock device and screw in safety plug. After these steps are taken then continue on with procedure.

Isaac Bertrand the Radiation Safety Officer for B & B X-Ray and Inspection was unaware that Mr. Bechtel was operating the exposure device incorrectly. During previous unannounced field inspections conducted by Mr. Bertrand, Mr. Bechtel was observed to have operated the device in the appropriate and required manner.

B & B realizes the severity of this type of violation due to the potential for over exposure to the operator of the device. Disciplinary actions in addition to corrective actions have been taken to ensure that the event will not occur again.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "F".

A "Caution High Radiation Area" sign was not posted at the boundary of a high radiation area during radiographic operations. Mr. Bechtel was the operating Radiographer present during the audit and in direct defiance of BBXR QAM Section II, Mr. Bechtel failed to follow the procedures specified. The QAM reads as follows:

2.5 DEFINING AND RESTRICTING RADIATION AND HIGH RADIATION AREAS

2.5.1 Radiation Area means any area accessible to individuals in which there exists radiation at such levels that an individual could receive in any one hour dose to the whole body in excess of five(5) millrems. Radiation areas must be posted with signs bearing the radiation caution symbol and the words "Caution Radiation Area". B & B's policy is to use these signs to mark the perimeter of the controlled area.

2.5.2 High Radiation areas are those areas accessible to individuals which contain radiation levels such that a person continuously present in the area could receive an exposure in excess of 100 mr in any one hour. The limits of these areas must be posted with the signs bearing the radiation caution symbol and the words "Caution High Radiation Area". Normally these signs would be posted at the estimated 100mr/hr isodose line.

2.5.3 Determine an area larger than necessary for actual exposure, from calculations for source strength and distance. This area shall be roped and posted. Once an exposure is in operation according to Sec. 2.19.6 of BBXR QAM, using a survey meter, move to the 100 mr/hr. area, then move back to the 2 mr/hr. area, complete the exposure. After securing the exposure device, place High radiation signs at the 100 mr/hr. mark, at least four signs, one each at 90 degrees of the perimeter. Moving back to the 2 mr/ hr. mark, Caution Radiation Area signs are to be placed, at least one every 90 degrees of the perimeter. Also barrier rope or ribbon will be used here to barricade the area from unauthorized entry by non monitored personnel. Signs may be hung off the barricade or placed on the ground directly below the barricade.

2.7 PHYSICAL RADIATION SURVEY DURING AN EXPOSURE

2.7.1 Determine an area larger than necessary for actual exposure from calculations for source strength and distance. This area shall be roped off and posted. (See 2.5.3)

2.7.2 Expose source as outlined in section II 2.19.6.

2.7.3 Survey boundaries determined in paragraph 2.7.1 above using survey instrument.

2.7.4 Make adjustments as necessary to maintain levels at 2mr in one(1) hour or less.

2.7.5 A Record of these surveys must be maintained and should contain sketches and instrument readings and explanatory notes if area was restricted to other than the 2 mr/hr isodose line.

2.7.6 If more than one exposure is taken in the same area, and there is no change in the restricting area, it is not necessary that the limits of the restricted area again be surveyed.

B & B realizes the severity of this type of violation due to the potential for over exposure to non-monitored personnel. Disciplinary action as well preventive actions have been taken to ensure that the event will not occur again.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "H".

A projector containing a 56 curie source was transported by Mr. Bechtel to SLC 4 East with out the proper DOT shipping papers. The proposed BBXR Transportation QAM reads as follows:

2.16 SHIPPING PAPERS

2.16.1 Common Carrier: Apply a shipping label and shippers certificate to the package.

1. Obtain a uniform bill of lading and any other necessary shipping papers from the freight carrier.
2. Complete the shipping papers in triplicate. Maintain one copy in file with the survey results.

2.16.2 Company Vehicles: Daily form 02 (BBXR QAM Section IX) will be properly completed as well as form 05 (DOT Papers) all will be submitted in a timely fashion for proper retention by BBXR for a period of three years.

Shipping papers were provided to Mr. Bechtel by B & B but, he elected not to complete the forms. B & B believes this to be a isolated incident unique to Mr. Bechtel. All employees are required to, and do, complete the required shipping papers prior to each trip. Disciplinary as well as preventive actions have been taken to ensure that the event does not occur again.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01

Summary of corrective/ disciplinary actions enacted with regard to apparent violations "A", "B", "F", and "H".

After an internal review B & B has determined that violations "A", "B", "F", and "H" were the direct result of Mr. Spencer Bechtel's actions with complete disregard to Federal, State and company authority.

At the discretion of Mr. Isaac Bertrand (R.S.O.) it has been determined that the nature of Mr. Bechtel's violations, particularly failure to properly secure the device and the improper survey of the device, were of such magnitude that the only prudent manner in which to deal with the violations given Mr. Bechtel's rank in the company (Vice President and Alternate R.S.O.) was to be a termination of the partnership involving Mr. Bertrand and Mr. Bechtel and the complete separation of Mr. Bechtel from B & B X-Ray. Mr. Bechtel last performed radiographic operations on February 18, 1990 as an agent of B & B.

The duties of Mr. Bechtel have been resumed by Mr. Aal pending approval by the State of California.

In addition, emphasis was placed on the nature of Mr. Bechtel's violations at subsequent safety meetings held after the audit in February of 1990. B & B will commit to the continuing education of present and future Radiographers to ensure that potential for these types of violations is minimized.

The following documents can substantiate the corrective and disciplinary actions taken by Mr. Bertrand on behalf of B & B X-Ray.

CONTINUATION AGREEMENT

This continuation agreement is made on March 14, 1990 between ISAAC BERTRAND (hereafter "continuing partner") and SPENCER BECHTEL (hereafter "former partner") to provide for the orderly continuation of the business of B & B X-RAY AND INSPECTION (hereafter "the partnership").

RECITALS

WHEREAS, the former partner and the continuing partner are equal partners in the partnership;

WHEREAS, the authority of the former partner to bind the partnership was terminated on December 31, 1989;

WHEREAS, the former partner has provided services to the partnership since December 31, 1989 as an independent contractor;

WHEREAS, the former partner has been fully paid for all services he has conveyed to the partnership;

WHEREAS, the former partner desires to withdraw from the partnership by transferring his entire interest in the partnership to the continuing partner;

NOW, THEREFORE, the parties agree as follows:

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NATURE AND EFFECT OF AGREEMENT

1.1 Under the terms and conditions set forth in this agreement, the former partner agrees to transfer to the continuing partner and the continuing partner agrees to acquire, in accordance with the Balance Sheet marked Exhibit "A", attached hereto and incorporated by reference, all of the former partner's rights, title, interest in the partnership, its assets, and profits, and all of the former partner's rights and claims against the partnership and the continuing partner.

1.2 The former partner's interests transferred by this agreement include but are not limited to any interest that the former partner may have in the partnership's (1) name or any name or mark under which it does business or which identifies any of its products; (2) tangible property, real or personal, wherever located; (3) accounts receivable; and (4) goodwill and other intangible assets.

1.3 In addition to other good and sufficient consideration, the receipt of which is hereby acknowledged, the continuing partner agrees to assume all future partnership obligations and liabilities, as set forth herein.

1.4 The continuing partner shall, as of December 31, 1989, assume all of the partnership's obligations and liabilities whether accrued, contingent, or otherwise, existing on or before the date of the execution of this agreement. As of December 31, 1989, the former partner shall have no authority to incur any

obligation or liabilities on behalf of the partnership, compromise any obligations to the partnership, or participate in any way in partnership management or control, and hereby covenants that he will not do any of the above.

1.5 The continuing partner shall be liable for performance of his obligations under this agreement, and shall assume or otherwise be responsible for all partnership obligations and liabilities incurred on or after December 31, 1989.

INDEMNIFICATION

2.1 The continuing partner hereby agrees to indemnify the former partner and hold the former partner harmless from all losses, claims, expenses, damages, or liabilities in kind, including attorney's fees, arising from past, existing, or future debts, liabilities, or obligations of the partnership or its business (whether the business is continued in its present form or in some other entity, form of association, or enterprise), and from any breach of or default under any of the continuing partner's obligations, except for any losses, claims, damages, or liabilities arising from or connected with the following:

2.1.1 The former partner's negligence, gross negligence, or willful misconduct in connection with the partnership business or the conduct of its affairs;

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relationships between the continuing partner and the former partner shall be the date of execution of this agreement. From the date of the execution of this agreement the former partner shall not have authority as agent of the continuing partner or of the partnership and shall not enter into any agreements, arrangements, or understandings on behalf of the partnership or the continuing partner, render any service to or on behalf of the partnership, or participate in any way in the management or control of its business or receive any compensation from the partnership.

NON-COMPETITION

4.1 The former partner agrees that he shall not at any time before January 1, 1995, directly or indirectly engage in, or have any interest in any person, firm, corporation, or business (whether as an employee, officer, director, agent, security holder, creditor, consultant, or otherwise) that engages in any activity within ~~the~~ ^{Butler} County which is the same as, similar ~~to~~ ^{to} competitive with any activities that the partnership has engaged in within the geographical territory listed above.

This paragraph to be omitted from this agreement AND NOT BINDING AGAINST SPENCER BECKMAN 3-14-90

4.2 The former partner further agrees not to divulge, communicate, use to the detriment of the partnership or its successors or for the benefit of any other person or persons, or misuse in any way any confidential information or trade secrets of the partnership or its successors, including but not limited

to personnel information, secret processes, know-how, customer lists, recipes, formulas, or other technical data. The former partner acknowledges and agrees that any such information or data acquired through connections with the partnership was received in confidence and as a fiduciary of the partnership and its successors.

RETENTION OF RECORDS

5.1 The continuing partner shall retain custody of all the existing books and records of the partnership until December 31, 1993. The former partner shall have access to these books and records at all reasonable times during working hours, and at his expense may copy all or any part of these records for any proper purpose.

EXECUTION OF OTHER DOCUMENTS

6.1 Each party to this agreement shall cooperate fully in the execution of any and all other documents and in the completion of any additional actions that may be necessary or appropriate to give full force and effect to the terms and intent of this agreement.

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ENTIRE AGREEMENT

7.1 This agreement contains the entire agreement between the parties.

EFFECTIVE DATE

8.1 This agreement shall become effective immediately upon execution by the continuing partner and former partner.

GOVERNING LAW

9.1 This agreement is entered into, and shall be construed and interpreted in accordance with, the laws of the State of California.

Isaac J. Bertrand
ISAAC BERTRAND

3-14-90
DATED

Spencer Bechtel
SPENCER BECHTEL

3/14/90
DATED

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

(805) 631-1812

March 19, 1990

Mr. Frederick T. Toyama
Department of Health Services
P.O. Box 942732
Sacramento, CA. 94234-7320

RE: RADIOACTIVE MATERIALS LICENSE NUMBER 5368-15

Dear Mr. Toyama:

This is to report to the California Department of Health Services that Mr. Spencer Bechtel is no longer with B & B X-Ray. As Mr. Bechtel was the Alternate Radiation Safety Officer this position was left vacant by his departure. I have appointed Jeffrey Aal a Radiographer currently on License number 5368-15.

Mr. Aal will be assuming all duties described in the License requirements as Alternate Radiation Safety Officer.

Thank you for your time regarding this matter.

Sincerely,

Isaac J. Bertrand
Isaac J. Bertrand

B & B X-RAY and INSPECTION
2015 Westwind Dr. # 10
Bakersfield, CA 93301
(805) 631-1812
License No. 5368-15

UNANNOUNCED FIELD SURVEY

To be performed by the RSO or his alternate. A copy of this report is to be put into the Radiographer's and the Assistant's personnel file.

DATE: 8/2-25-91

RADIOGRAPHER: SPENCER BECHTEL ASSISTANT: RICK ROBINSON
CUSTOMER: PYRO POWER LOCATION: TROMA, CA

1. Was customer informed of radiation areas? YES
2. Was area posted properly? YES
3. Were signs in good condition? YES
4. Was radiation field report being used? YES
5. Was survey meter being used? YES
Ser. # 1950 Calibration Date 1-26-90
6. Was meter in good condition? YES
7. Was Radiographer wearing a dosimeter and film badge? YES
8. Was Assistant wearing a dosimeter and film badge? YES
9. Was isotope projector being used properly? YES
10. Condition of equipment being used? good
11. General appearance of darkroom and equipment? good
12. Did radiographer have a copy of the following:
 - a. Operating and Emergency procedure (Q.A.M.)? YES
 - b. Radioactive Material License? YES
 - c. State of CA code book, Title 17? YES

REMARKS: _____

RADIOGRAPHER: Spencer Bechtel RSO: James Bechtel

B. X-Ray and INSPECTION
2015 Westwind Dr. # 10
Bakersfield CA 93301

Periodic Refresher Course / Safety Meeting
Date of meeting: 2/16/1990

Periodic refresher courses are required every two months and must be conducted by the RSO or his alternate these courses must include the following:

- Copies of new regulations.
- Any problems with equipment.
- Care of equipment at all times
- New policies relating to the Operating and Emergency Procedures.

Periodic Safety meetings are required once every six months and must include the following:

- Radiation safety hazards and preventive measures
- Safe Radiographic techniques
- Oral review of operating and emergency procedures
- Over exposure received by personnel and how to prevent reoccurrence.
- Question and answer session.

Notes: Emphasized the importance of properly
completing documentation on all radiographic
operations also reviewed BBR Qam see II and
see I, reviewed title 17 regarding sec 30330
thru 30335

Employees attending:

x <u>Bruce Wedel</u>	x _____
x <u>Erin A. Foster</u>	x _____
x <u>[Signature]</u>	x _____
x _____	x _____

Instructor - Isaac Burkhardt

C & B X-Ray and INSPECTION
2015 Westwind Dr. # 10
Bakersfield CA 93301

Periodic Refresher Course / Safety Meeting

Date of meeting: 3/12/90

Periodic refresher courses are required every two months and must be conducted by the RSO or his alternate these courses must include the following:

- Copies of new regulations.
- Any problems with equipment.
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- Over exposure received by personnel and how to prevent reoccurrence.
- Question and answer session.

Notes: Problems of Recent NRC Audits were discussed

Review of all safety procedures, maintenance programs,
discussed in detail. Continued emphasis on
BBXr Cam, Title 17, and completion of
paperwork.

instructor - Isaac Butland

Employees attending:

- x Brent Walsh
- x Richard A. Felt
- x JR 3-12-90
- x _____

- x Isaac Butland RSO
- x _____
- x _____
- x _____

B & B X-RAY and INSPECTION

2015 Westwind, Suite 10
 Bakersfield, California 93301
 (805) 631-1812

NO of PAGES.	IPZ. MW.	FULL D.O.T. SHIPPING NAME/DESCRIPTION OF MATERIALS	HAZARD CLASS	UN / NA I.D. NUMBER	QUANTITY WEIGHT VOLUME
	XX	INDUCTIVE MATERIAL SPECIAL FORM N.O.S.	RADIOACTIVE	UN 2974	.2966 GRAMS
		IRIDIUM 192 SOLID _____ CURIES			
		RADIOACTIVE YELLOW III			
		TRANSPORT INDEX			
		TYPE B PACKAGE			
		STORAGE BOX SURFACE READING			
		CAMERA #			
		SOURCE #			

MON. _____ TUES. _____ WED. _____ THRU. _____ FRI. _____ SAT. _____ SUN. _____

INSIDE

- Parking Brakes (Apply)
- START ENGINE**
- Oil Pressure Light w Gauge
- Instrument Panel (Check lights w buzzer)
- Horn
- Windshield Wiper and Wash
- Starter - Detester
- Mirrors
- Steering Wheel (Locks plug)
- Turn on all lights including Emergency Flasher
- Two Combination and Warning Devices

OUTSIDE:

FRONT

- Headlights
- Chrome Lights
- Identification Lights
- Turn Signals and Emergency Flasher
- Tires and Wheels (Lugs)

LEFT SIDE

- Fuel Tank and Cap
- Side Marker Lights
- Reflectors
- Tires and Wheels (Lugs)
- Cargo Tie-Down/ or Doors

REAR

- Tail Lights
- Stop Lights
- Turn Signals and Emergency Flasher
- Clearance Lights
- Identification Lights
- Reflectors
- Tires and Wheels (Lugs)
- Rear End Protection (Dumper)
- Cargo Tie-Down/ or Doors

RIGHT SIDE

- Fuel Tank and Cap
- Side Marker Lights
- Reflectors
- Tires and Wheels (Lugs)
- Cargo Tie-Down/ or Doors

ON COMBINATION

- Hoses and Couplers
- Electrical Connector

ON VEHICLES TRANSPORTING HAZARDOUS MATERIALS

- Marking or Placards
- Proper Shipping Papers

B & B X-RAY and INSPECTION
 QAM SECTION IX
 PAGE # 5

DRIVER'S NAME: _____

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violations "C" and "D".

Apparent violations "C" and "D" are both detail oriented violations. Both center around the failure of the acting radiographer to properly complete the required forms.

Radiological surveys were not properly recorded. Readings provided by the survey of the radiographic device must be maintained as provided for in Section II of the BBXR QAM which reads as follows:

2.10 PHYSICAL RADIATION SURVEY PRIOR TO STORAGE OF DEVICE

2.10.1 After determining that source is in safe position in device from meter reading, lock device and screw in safety plug.

2.10.2 Use survey meter to measure radiation levels at surface of device. Also take readings at about six inches (6") from the surface of the device the survey meter readings should drop if the source is properly secured in its shielded position in the device. Surface readings may vary from 10 mr to 200 mr/hr. Be sure all safety plugs are in the device. CAUTION: A zero reading is an indication that the survey meter is not operating properly and should be treated as an emergency situation.

2.10.3 Return device to storage area.

2.11 PHYSICAL RADIATION SURVEY OF OUTER SURFACES OF TRANSPORTING VEHICLE

2.11.1 Since the outer surface of a vehicle must be treated as a unrestricted area when the vehicle contains a radiographic exposure device, a physical radiation survey of the vehicle must be made after an exposure device is secured in the vehicle to assure that radiation levels outside the vehicle does not exceed 2 mr/hr. at one meter. Record of this survey shall be made on the work sheet provided.

As reported by Mr. Skov the storage readings were improperly recorded on form 02 by the acting Radiographer. The corrective actions taken by B & B regarding this event are described below.

Another detailed oriented apparent violation is the failure to properly record Dosimeter readings. Section II of the B & B X-Ray QAM requires that all daily readings of dosimeters be recorded on form 02 (Section IX QAM). Section II with regards to daily

readings is as follows:

2.1 PERSONNEL MONITORING EQUIPMENT

2.1.1 Each Radiographer and Radiographer's Assistant shall wear a film badge and pocket dosimeter. The pocket dosimeter must be capable of measuring doses from zero to at least two hundred (200) milliroentgen. A film badge and dosimeter shall be assigned to and worn by only one person

2.1.2 If a dosimeter should go off scale (over 200 mr), stop work and notify the RSO or his Alternate immediately.

2.1.3 If a dosimeter becomes fully discharged, the film badge shall be processed immediately to determine if any over-exposure has taken place. Such a film badge must be taken to the RSO who will send it to the film badge supplier for immediate processing. Having followed this procedure, immediately recharge the dosimeter and leave it in area free from any type of radiation for a period of one hour. After this time lapse, recheck the dosimeter. If it is again discharged, totally or partially, then in all probability you have not been exposed to any overdose of radiation. This would indicate that the dosimeter is probably faulty. Only the RSO may decide whether or not you may return to radiation work after he has carefully evaluated the situation.

As reported by David Skov the readings were apparently taken but were not properly recorded. While B & B does not feel that failing to record the readings is in any way a minor event the severity of this violation is minor in our estimation.

Due to the nature of these infractions, no possibility of personnel overexposure, disciplinary action was not taken. However, corrective actions have been taken to ensure that the likelihood of this event occurring again is deminished.

B. X-Ray and INSPECTION
2015 Westwind Dr. # 10
Bakersfield CA 93301

Periodic Refresher Course / Safety Meeting
Date of meeting: 2/16/1950

Periodic refresher courses are required every two months and must be conducted by the RSO or his alternate these courses must include the following:

- Copies of new regulations.
- Any problems with equipment.
- Care of equipment at all times
- New policies relating to the Operating and Emergency Procedures.

Periodic Safety meetings are required once every six months and must include the following:

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- Question and answer session.

Notes: Emphasized the importance of properly
completing documentation on all radiographic
operations Also reviewed BBR Qam see II and
see I, reviewed title 17 regarding sec 30330
thru 30335

Employees attending:

- | | |
|--------------------------|---------|
| x <u>Bruce W. Lohal</u> | x _____ |
| x <u>Edna A. Roberts</u> | x _____ |
| x <u>J. Lohal</u> | x _____ |
| x _____ | x _____ |

Instructor - Irvin Burkhardt

B X-Ray and INSPECTION
2015 Westwind Dr. # 10
Bakersfield CA 93301

Periodic Refresher Course / Safety Meeting

Date of meeting: 3/12/90

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BBXr Cam, Title 17, and completion of
paperwork

instructor - James Butland

Employees attending:

- x Brent Wild
- x Richard A. Tolson
- x J. H. Lee 3-12-90
- x _____

- x James Butland RSO
- x _____
- x _____
- x _____

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "I", "J", and "K".

The outer foot locker of a storage device was not labeled with a "Radioactive Label". B & B management takes full responsibility for this violation. Corrective actions have been taken (a B & B vehicle will be provided upon request for verification) to ensure full compliance for all vehicles.

The second and third apparent violations were that B & B did not have an approved Transportation QAM on file with the office of Material and Safety nor was B & B registered as a "User of Radioactive Materials". Once again, B & B management takes full responsibility for this apparent violation. However, in the report compiled by Mr. Skov sections 2.11 and 2.12 of the BBXR QAM were apparently overlooked by Mr. Skov. B & B has been in contact with Mr. Len Gordon of the NRC, Transportation Branch, Division of Safeguards and Transportation, NMSS in attempts to have the proposed BBXR Transportation QAM approved. The failure to comply with this requirement of 10 CFR was an unfortunate oversight on the part of Mr. Bertrand.

To date B & B has not received approval of the Proposed Transportation QAM. A copy of the Proposed Transportation QAM as well as all transmissions between B & B and the Office of the Transportation Branch are included with this report. Once the proposed manual is approved any changes mandated by the acceptance of the manual will be incorporated into B & B X-Ray's General QAM.

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

(805) 631-1812

March 12, 1990

Director
Office of Nuclear Material Safety and Safegaurds
United States Nuclear Regulatory Commission
Washington D.C. 20555

Dear Sir:

Isaac Bertrand dba B & B X-RAY would like to be listed as a registered user of the following radioactive materials packages.

A. SPEC C-1 source changer	USA/0936/B()
B. Gamma Century S, Century SA,	USA/9135/B(U)
C. Tech/Ops Model A 424-9	USA/9033/B(U)

Only those individuals listed on the California Radioactive Material License (copy enclosed) as authorized users will be transporting the devices.

As it is foreseeable that B & B X-Ray may be requested to work on various Federal installations a Quality Assurance Manuanl for the transportation of radioactive material onto Federal property is being assembled. Any information that you can provide to B & B for this purpose would be of great value.

Sincerely,

Isaac J. Bertrand
Isaac J. Bertrand R.S.O.

Jsa

Enc.


9663296253 (6pp)

FROM (COMPANY NAME) B & B X-RAY and INSPECTION			ORIGIN	AIRBILL NUMBER 634521436	AIRBORNE EXPRESS
ADDRESS 2015 Westwind DR. # 10			CUSTOMER AIRBORNE EXPRESS ACCOUNT NUMBER		
CITY Bakersfield	STATE CA	ZIP CODE (REQUIRED) 93301	SENDER 48197270		
SENT BY (NAME/DEPT.) J. AAL			RECEIVER		
PHONE (805) 631-1812			METHOD OF PAYMENT ASSUMED UNLESS OTHERWISE NOTED		
TO (COMPANY NAME) U.S. Nuclear Regulatory Commission			<input checked="" type="checkbox"/> BILL SENDER <input type="checkbox"/> BILL RECEIVER <input type="checkbox"/> BILL 3 RD PARTY AIRBORNE ACCOUNT NO. _____ <input type="checkbox"/> PAID IN ADVANCE CHECK NO. / AMOUNT _____		
ADDRESS White Flint North			BILLING REFERENCE WILL APPEAR ON PACKAGE		
11555 Rockville Pike			NO. OF PACKAGES WEIGHT (LBS.) SUBJECT TO CONNECTION CHECK BY LETTER EXPRESS		
CITY Rockville	STATE MA	ZIP CODE (REQUIRED) 20852	1	2	
ATTN (NAME/DEPT.) Len Gordon / MNSB- SGTB			SPECIAL INSTRUCTIONS		
DESCRIPTION Transportation QAM			<input type="checkbox"/> SATURDAY DELIVERY <input type="checkbox"/> HOLD AT AIRBORNE OFFICE		
<input type="checkbox"/> DECLARED VALUE OF SHIPMENT <input checked="" type="checkbox"/> \$15.00		SHIPMENT VALUATION	PREPRINT FORMAT NO.	S SEARCHED BY SPPS ON REVERSE SIDE OF SENDER'S COPY	
SENDER SIGNATURE		DATE	AIRBORNE SIGNATURE	DATE	TIME
ROUTE		DROP OFF LOCATION			

SENDER'S COPY

EXECUTIVE OFFICES
P.O. BOX 262 SEATTLE WA 98111

THANK YOU FOR SHIPPING WITH AIRBORNE EXPRESS!



DO NOT USE THIS AIRBILL FOR SHIPMENTS WITHIN THE U.S. & TO AND FROM PUERTO RICO. PRESENT A HIGHER SHIPMENT VALUATION. CARRIER'S LIABILITY IS LIMITED TO \$9.07 PER POUND PER PIECE. SPECIAL OR CONSEQUENTIAL DAMAGES ARE NOT RECOVERABLE. SEE TERMS AND CONDITIONS ON REVERSE SIDE OF THIS NON-NEGOTIABLE AIRBILL.

SCAC 4888 REG. LD. NO. 9-083284

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Detailed reply to apparent violation "E"

10 CFR requires that records of receipt and transfer of radioactive material be maintained. B & B was in full compliance of this requirement. One of the sources transferred to B & B was provided by Western Inspection (David Norris) at the time of Mr. Skov's audit the transfer papers were in the receiving truck (received by Mr. Bertrand) and had not yet been placed in the files of B & B X-Ray.

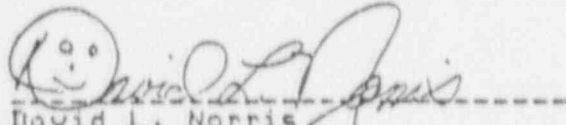
The second source transferred to B & B was a Tech-Ops 660 acquired by B & B in November of 1989. All inspections required including leak tests were performed on the device by B & B during the time the device was in the possession of B & B.

B & B believes that no violation occurred. In addition, at no time was Mr. Bertrand unaware of the requirements of transfer as suggested by Mr. Skov's report. Copies of the transfer papers are included with this report.

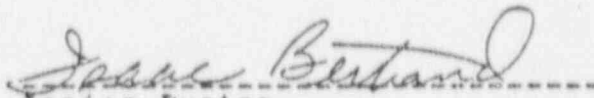
WESTERN INSPECTION AND TESTING SERVICES

X RAY SOURCE AND CAMERA
RENTAL AGREEMENT
26 JANUARY 1990

This agreement is between WESTERN INSPECTION AND TESTING SERVICES and B & B INSPECTION CO. who has agreed to rent one Gamma Industries 'CENTURY' model camera; serial number 2712 containing one (1) approximate 25 curie Iridium source for the consideration of \$25 per day. Issiac Burton; Radiation Safety Officer of B & B INSPECTION CO. in accepting this unit attest that his Companies Radioactive Materials License contains enough capacity as to allow the rental of this unit. He also agrees that he has inspected it and has found it in good operating condition and agrees to return it on the agreed schedule per my request in a like condition.



David L. Norris
Western Inspection
& Testing Services



Issiac Burton
B & B INSPECTION CO.

WESTEX COMPANY
100 WALTER ST. D
VENTURA, CA 93001
1807 619-231

350 K-RAY CO.
1015 WESTWIND DR. #10
WATERBURY, CT. 06701

11-18-89

EQUIPMENT: EQUIPMENT TRANSFER, RADIOACTIVE MATERIAL.
LOCATION: 1015 WESTWIND DR. #10, 350 K-RAY CO.

DEAR ISAAC:

THIS LETTER SHALL SERVE AS THE TRANSFER MECHANISM FOR THE TECH-OFS
MODEL 050 EXPOSURE DEVICE S.N. 2854 CONTAINING CR-147 SOURCE
S.N. 5200.
THE EQUIPMENT IS TO BE USED IN COMPLIANCE WITH ALL STATE AND FEDERAL
REGULATIONS WHICH APPLY.

SINCERELY YOURS,
Michael Lupo
MICHAEL LUPO, R.S.O.



UNITED STATES NUCLEAR REGULATORY COMMISSION
Washington, D.C. 20555

NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION (PART 20); NOTICES, INSTRUCTIONS AND REPORTS TO WORKERS; INSPECTIONS (PART 19); EMPLOYEE PROTECTION

WHAT IS THE NUCLEAR REGULATORY COMMISSION?

The Nuclear Regulatory Commission is an independent Federal regulatory agency responsible for licensing and inspecting nuclear power plants and other commercial users of radioactive materials.

WHAT DOES THE NRC DO?

The NRC's primary responsibility is to ensure that workers and the public are protected from unnecessary or excessive exposure to radiation and that nuclear activities including power plants are conducted to high quality standards and operated in a safe manner. The NRC does this by establishing requirements in Title 10 of the Code of Federal Regulations (10 CFR) and in licenses issued to nuclear users.

WHAT RESPONSIBILITY DOES MY EMPLOYER HAVE?

If a company that conducts activities covered by the NRC must comply with the NRC's requirements. If a company violates NRC requirements, it can be fined, have its license modified, suspended or revoked.

Your employer must tell you which NRC radiation requirements apply to your work. It must post NRC Notices of Violation covering radiological working conditions.

WHAT IS MY RESPONSIBILITY?

For your own protection and the protection of your co-workers, you should know how NRC requirements relate to your work and should obey them. If you observe violations of the requirements, you should report them.

HOW DO I REPORT VIOLATIONS?

If you believe that violations of NRC rules or of the terms of the license have occurred, you should report them immediately to your supervisor. If you believe that adequate corrective action is not being taken, you may report this to an NRC inspector or the nearest NRC Regional Office.

WHAT IF I WORK IN A RADIATION AREA?

If you work with radioactive materials or in a radiation (controlled) area, the amount of radiation exposure that you may legally receive is limited by NRC Regulations. The limits on your exposure are contained in sections 20.101, 20.103, and 20.104 of Title 10 of the Code of Federal Regulations (10 CFR 20). While these are the maximum allowable limits, your employer should also keep your radiation exposure as far below these limits as is "reasonably achievable."

MAY I GET A RECORD OF MY RADIATION EXPOSURE?

Yes. Your employer is required to tell you, in writing, if you receive any radiation exposure above the limits set in the NRC regulations or your employer's license. In addition, if your job involves radiation, you may request from your employer a record of your annual radiation exposures and a written report of your total exposure when you leave your job.

HOW ARE VIOLATIONS OF NRC REQUIREMENTS IDENTIFIED?

NRC conducts regular inspections at licensed facilities to assure compliance with NRC requirements. In addition, your employer and site contractors conduct their own inspections to assure compliance. All inspectors are protected by Federal law. Interference with them may result in criminal prosecution for a Federal offense.

MAY I TALK WITH AN NRC INSPECTOR?

Yes. Your employer may not prevent you from talking with an NRC inspector and you may talk privately with an inspector and request that your identity remain confidential.

MAY I REQUEST AN INSPECTION?

If you believe that your employer has not corrected violations involving radiological

working conditions, you may request an inspection. Your request should be addressed to the nearest NRC Regional Office and must describe the alleged violation in detail. It must be signed by you or your representative.

HOW DO I CONTACT THE NRC?

Notify an NRC inspector on-site or call the nearest NRC Regional office collect. NRC inspectors want to talk to you if you are worried about radiation safety or other aspects of licensed activities, such as the quality of construction or operations at your plant.

CAN I BE FIRED FOR TALKING TO THE NRC?

No. Federal law prohibits an employer from firing or otherwise discriminating against a worker for bringing safety concerns to the attention of the NRC. You may not be fired or discriminated against because you:

- ask the NRC to enforce its rules against your employer;
- testify in an NRC proceeding;
- provide information or are about to provide information to the NRC about violations of requirements;
- are about to ask for or testify, help, or take part in an NRC proceeding.

WHAT FORMS OF DISCRIMINATION ARE PROHIBITED?

No employer may fire you or discriminate against you with respect to pay, benefits, or working conditions because you help the NRC.

HOW AM I PROTECTED FROM DISCRIMINATION?

If you believe that you have been discriminated against for bringing safety concerns to the NRC, you may file a complaint with the U.S. Department of Labor. Your complaint must describe the firing or discrimination and must be filed within 30 days of the occurrence.

Send complaints to:

Office of the Administrator
Wage and Hour Division
Employment Standards Administration
U.S. Department of Labor
Room 53502
200 Constitution Avenue, N.W.
Washington, D.C. 20210

or any local office of the Department of Labor, Wage and Hour Division. Check your telephone directory under U.S. Government listings.

WHAT CAN THE LABOR DEPARTMENT DO?

The Department of Labor will notify the employer that a complaint has been filed and will investigate the case.

If the Department of Labor finds that your employer has unlawfully discriminated against you, it may order you to be reinstated, receive back pay, or be compensated for any injury suffered as a result of the discrimination.

WHAT WILL THE NRC DO?

The NRC may alert the Department of Labor in its investigation. NRC may conduct its own investigation where necessary to determine whether unlawful discrimination has prevented the free flow of information to the Commission. Also, if the NRC or Department of Labor finds that unlawful discrimination has occurred, the NRC may issue a Notice of Violation to your employer, impose a fine, or suspend, modify, or revoke your employer's NRC license.

UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONAL OFFICE LOCATIONS

A representative of the Nuclear Regulatory Commission can be contacted at the following addresses and telephone numbers. The Regional Office will accept collect telephone calls from employees who wish to register complaints or concerns about radiological working conditions or other matters regarding compliance with Commission rules and regulations.



Regional Offices

REGION	ADDRESS	TELEPHONE
I	U.S. Nuclear Regulatory Commission Region I 475 Alexander Road King of Prussia, PA 19406	215 337-8900
II	U.S. Nuclear Regulatory Commission Region II 101 Morris Bl., N.W. Atlanta, GA 30323	404 521-4900
III	U.S. Nuclear Regulatory Commission Region III 788 Rossini Road Oven Elm, IL 60137	312 795-8800
IV	U.S. Nuclear Regulatory Commission Region IV 811 Ryan Plaza Drive, Suite 1000 Arlington, VA 22211	817 885-8100
V	U.S. Nuclear Regulatory Commission Region V 1450 Marie Lane, Suite 210 Walnut Creek, CA 94598	415 943-3700

NOTICE TO EMPLOYEES

STANDARDS FOR PROTECTION AGAINST RADIATION

CALIFORNIA RADIATION CONTROL REGULATIONS (17 CA ADM CODE SECTIONS 30260 ET SEQ.)

The California Radiation Control Regulation includes standards for protection against radiation hazards. The State Department of Health Services has primary responsibility for administering these standards which apply to both employers and employees. Enforcement is carried out by the Department of Health Services or its contractors, the Division of Occupational Safety and Health Administration, Department of Industrial Relations, the Los Angeles County Bureau of Occupational and Radiation Management, and the Orange County Health Department.

EMPLOYEE'S RESPONSIBILITIES

You should know and understand those California Radiation protection standards and your employer's operating and emergency procedures which apply to your work. You should comply with their requirements for your own safety and the safety of others.

SCOPE OF THE STANDARDS

The Standards for Protection Against Radiation define:

1. Limits on exposure to radiation and radioactive materials in controlled and uncontrolled areas;
2. Actions to be taken after accidental exposure;
3. Working conditions requiring personal monitoring, safety surveys and safety equipment;
4. Proper use of caution signs, labels and safety interlock devices;
5. Requirements for keeping worker exposure records and reporting of such exposures;
6. The requirement for specific operating and emergency procedures for radiation work; and
7. The rights of workers regarding safety inspections.

EMPLOYER'S RESPONSIBILITIES

Your employer is required to:

1. Comply with the requirements of the California Radiation Control Regulations, Departmental orders and license conditions;
2. Post or make available to you copies of the Radiation Control Regulations, any license issued thereunder and your operating and emergency procedures;

3. Post any notice of violation of radiologic working conditions; and
4. Provide you with information on your exposure to radiation.

REPORTS ON YOUR RADIATION EXPOSURE HISTORY

1. California Radiation Control Regulations require your employer to give you a written report if you receive an exposure greater than the limits set in the radiation safety standards. Basic limits for occupational radiation exposure can be found in Sections 30265 and 30266. These Sections specify limits on exposure to radiation and exposure to concentrations of radioactive material in air.
2. If the radiation protection standard, Section 30276-7, requires that your radiation exposure be monitored, your employer must, upon your request, (a) give you a written report of your exposures upon termination of your employment, and (b) advise you of your exposures annually.

INSPECTIONS

The Department or one of its contractors will inspect your workplace from time to time to ensure that health and safety requirements are being followed and that these requirements are effective in protecting you. Inspectors may confer privately with you at the time of inspection. At that time you may direct the inspector's attention to any condition you believe is or was a violation of the safety requirements.

In addition, if you believe at any time that any health and safety requirements are being violated, you or your workers' representative may request that an inspection be made by sending a complaint to the Department of Health Services or other official agency at the address listed below. Your complaint must describe the specific circumstances of the apparent violation and must be signed by you or your workers' representative. The Department is required to give your employer a copy of any such complaint. Names may be withheld at your request. You should understand, however, that the law protects you from being discharged or discriminated against in any way for filing a complaint or otherwise exercising your rights under the California Radiation Control Regulations.

FOR INFORMATION & ASSISTANCE CONTACT:

CALIFORNIA RADIATION CONTROL PROGRAM OFFICES

Address	Telephone (daytime)	Address	Telephone (daytime)
RADIOLOGIC HEALTH BRANCH		DIVISION OF OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION	
CALIFORNIA DEPARTMENT OF HEALTH SERVICES		CALIFORNIA DEPARTMENT OF INDUSTRIAL RELATIONS	
744 P Street Sacramento, CA 95814	(916) 445-0831	525 Golden Gate Avenue, Room 300 San Francisco, CA 94102 P. O. Box 803 San Francisco, CA 94101	(415) 567-3390
2151 Berkeley Way Berkeley, CA 94704	(415) 840-2014	8150 Van Nuys Avenue, Suite 310 Van Nuys, CA 91401	(818) 801-6423
1448 West Temple Street Los Angeles, CA 90026 P. O. Box 30327 Los Angeles, CA 90030	(213) 620-2800	LOCAL AGENCIES	
		Los Angeles County Health Dept. Radiologic Health Services 2615 South Grand Avenue, Room 808 Los Angeles, CA 90007	(213) 744-3264
		Health Care Agency Radiologic Health 1725 W. 17th Street Santa Ana, CA 92706	(714) 834-6884

RADIATION EMERGENCY ASSISTANCE ONLY (916) 391-7716 ALL HOURS

POSTING REQUIREMENTS

Copies of this notice must be posted in a sufficient number of places in every establishment where employees are employed in activities regulated by the Department of Health Services, to permit employees working in or frequenting any portion of a controlled area to observe a copy on the way to or from their place of employment.



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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 04 1990

SGTB:ER
71-9033
71-9135

B & B X-Ray
ATTN: Mr. Isaac J. Bertrand, RSO
2015 Westwind Drive, Suite 10
Bakersfield, CA 93301

Dear Mr. Bertrand:

I am responding to your letter dated March 12, 1990, concerning package registration.

Please note, Section 71.12 of 10 CFR Part 71 requires as a condition of general license provisions an approved quality assurance (QA) program. Accordingly, we are unable to register you for use of the packages requested at this time. It will be necessary for you to obtain an approved QA program prior to the registration as a package user or the delivery of licensed material to a carrier for transport pursuant to 10 CFR Part 71.

Enclosed for your information is a copy of Regulatory Guide 7.10, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material." Annex 3 of the Regulatory Guide may be applicable to the activities you propose.

If further assistance is needed, you may contact Len Gordon of my staff at (301)492-0482.

Sincerely,

A handwritten signature in cursive script that reads "Charles E. MacDonald".

Charles E. MacDonald, Chief
Transportation Branch
Division of Safeguards
and Transportation, NMSS

Enclosure:
As stated

9004120186 (p)

B & B X-RAY and INSPECTION
2015 Westwind Drive Suite 10
Bakersfield CA 93301

(805) 631-1812

April 11, 1990

Mr. Len Gordon
Office of Nuclear Material Safety and Safegaurds
United States Nuclear Regulatory Commission
Washington D.C. 20555

Dear Mr. Gordon:

Enclosed is a copy of the proposed B & B X-Ray and Inspection Quality Assurance Program as required by part 71 of 10 CFR. If the manual is approved Isaac Bertrand dba B & B X-RAY would like to be listed as a registered user of the following radioactive materials packages.

A. SPEC C-1 source changer	USA/0936/B()
B. Gamma Century S, Century SA,	USA/9135/B(U)
C. Tech/Ops Model A 424-9	USA/9033/B(U)

Only those individuals listed on the California Radioactive Material License (copy enclosed) as authorized users will be transporting the devices.

If at all possible confirmation by telephone, followed by written confirmation would be greatly appreciated. If any changes are required for approval please feel free to contact myself or my Alternate R.S.O. at (805) 631-1812.

Sincerely,

Isaac J. Bertrand
Isaac J. Bertrand R.S.O.

IJB/jsa

Enc.

900420032319

B & B X-RAY
2015 Westwind Drive Suite 10
Bakersfield CA 93301
(805) 631-1812

April 17, 1990

United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

SUBJECT: INSPECTION REPORT NO. 99990005/90-01
Concluding Statement.

Dear Sirs:

B & B does not knowingly violate or expect any employee to violate any license requirements or the requirements of the governing agency. This commitment is best exemplified by B & B's own discontinuation of the operations at Vandenberg AFB SLC 4 once notification of apparent violations was given, and brought to the Radiation Safety Officers attention.

In summary the corrective actions taken by B & B are as follows:

- A. Disciplinary action enacted upon Mr. Bechtel.
- B. Preventive action taken to ensure that the events will not occur again.
- C. Compilation of a Transportation QAM.

As demonstrated by the actions taken by B & B, the depth of this report and, the additional information provided, B & B does not neglect the duties and/or responsibilities of the Radioactive Materials License issued. B & B would like to pledge to a higher degree of performance in the future and has gained valuable experience for our young organization as a result of this audit.

If any additional information is requested please feel free to contact myself or my staff at (805) 631-1812.

Sincerely,
Isaac J. Bertrand
Isaac J. Bertrand
Radiation Safety Officer

IJB:jsa

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(1p)