



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

JUN 14 1990

MEMORANDUM FOR: File, Valley Industrial X-Ray
California License No. 4182-15

FROM: James L. Montgomery
Senior Materials Specialist

SUBJECT: RECIPROCITY INSPECTION

On May 21, 1990, the subject inspection was conducted by James L. Montgomery and Robert J. Pate at the licensee's Bakersfield, California office. The licensee had conducted radiographic activities under federal jurisdiction in 1988 at Vandenberg Air Force Base, and in 1989 at Edwards Air Force Base. The NRC staff was not notified of the Edwards AFB work as required in 10 CFR 150.20.

An NRC staff inspection goal is to conduct more field inspections of licensees conducting licensed activities such as the work performed at U. S. Air Force Bases.

Enclosed with this memorandum are the inspection field notes, and the NRC Form 591. The latter was left with the licensee at the conclusion of the inspection. A copy of the field notes and the 591 form were mailed to the California State Department of Health Service.

Several violations of NRC requirements were found during this inspection.

James L. Montgomery
James L. Montgomery
Senior Materials Specialist

GUIDANCE FOR INSPECTION PROCEDURE 87100

INDUSTRIAL RADIOGRAPHY INSPECTION FIELD NOTES

Inspection Report No. 90-07 License No. 4182-15 (CALIF.)

Licensee (name and address) Docket No. 15-000004

Valley Industrial X-Ray
6732 Fruitvale Ext., Bay #7
Bakersfield, CA 93312

Licensee Contact. Larry Williams, RSO Telephone No. 805-325-8497

Last Amendment No. 31 Date of Amendment. 5/4/90.

Priority: 1 Program Code () 03310 - Fixed () 03320 - Temporary

Date of Inspection 5/21/90

Type of Inspection () Announced () Initial
 Unannounced Special Reciprocity
 Reinspection

Next Inspection Date N/A () Normal () Extended () Reduced

Summary of Findings and Action:

- () No Noncompliance, Clear 591 issued
- () Action on Previous N/C
- Noncompliance, 591 issued
- () Regional Action
- () HQ Action

Personnel Contacted * Larry Williams, President & RSO
 * Terry Campbell, Vice President & Assistant RSO

* Those present at exit interview.

Inspector James L. Montgomery 6/1/90
 (Signature) (Date Signed)
 Approved _____
 (Signature) (Date Signed)

1. ORGANIZATION

a. Management Structure *President*
 Vice President
 2 clerical
 7 Radiographers

b. Administrative structure meets license requirements.
() 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 (*at Vandenberg & Edwards AFB job sites*)

Radiographers

Radiographer's Assistants

Eric Chapman

Billy Helt

Jeff Aal

Mike Belluomini

Paul VanHael

(continue d., if needed, on paragraph 22.)

2. INSPECTION HISTORY

a. Item(s) of noncompliance or deviations noted during last inspection conducted on *N/A none* () Yes () No

Corrected by letter dated _____

b. Requirement Severity Corrected Status

(continue b., if needed, on paragraph 22.)

c. If any item(s) of noncompliance or deviations noted during last inspection were not corrected, explain.

(continue c., if needed, on paragraph 22.)

3.

SCOPE OF PROGRAM

4.

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 Radiographer. () Yes () No [34.44]
Remarks.

c. Approved training program. () Yes () No

d. Deficiencies noted. () Yes () No [L/C]
Remarks.

e. Training provided by. RSO, Assistant RSO, & Tom Cuthyerson, Consultant

f. Written tests. () Yes () No

g. Oral tests. () Yes () No

h. Radiographers completed field examination. [34.31)a)(4) and (b)(3)] () Yes () No

i. Record of test results. () Yes () No [34.31(c)]
Remarks.

j. Test results reviewed by NRC inspector. () Yes () No

k. Radiographer completed on-the-job training. [34.11(b)(3)]
() Yes () No
Remarks.

l. Retraining program required by License Condition. () Yes () No

m. Periodic training. () Yes () No

n. Retraining program implemented: () Yes () No [L/C]
Remarks.

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

- p. Instruction to workers in accordance with 19.12.
 Yes () 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.

- b. Records maintained. () Yes No [L/C]
Remarks.

Quarterly audit records for radiographers & assistant radiographer not kept for March 1989 & October 1989 audits

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. Yes () No [34.28(b)]
Remarks.

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

Daily equipment checks not recorded on u-log for 10/26/89 job at Edwards AFB; Quarterly maintenance record missing for first quarter, 1989 when 3/24/89 job was performed at Edwards AFB.

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. Yes () No [34.31(a)(2)]
Remarks.

- b. Operating and Emergency Procedures approved by *State of Calif.* NRC. [34.11(c)]
 Yes () No

8. UTILIZATION LOG

a. Utilization log maintained. (✓) Yes () No [34.27]
Remarks.

b. Utilization log contains all required information. () Yes
(✓) No [34.27(a),(b),(c)]

Remarks. U-Log kept for 10/26/89 job at Edwards AFB did not include radiation survey results, daily equipment checks, isotope used, source strength, make, model & serial # of camera & dosimeter serial #.

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. 3/1/90

Source
Changer

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

192 Ir

Amerahom

RGSA 13 RS 13

Industrial Nuclear 2, B

SPEC

G1, G3

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. *not inspected; under state jurisdiction*

1) As described in application dated _____, Report
dated _____, or _____

- (a). Cell(s) interlocked [20.203(c)(2)(i)] () Yes () No
(b). Cell(s) controlled in accordance with 20.203(c)(2)(ii)
or (iii). [34.29(b)] () Yes () No
Remarks.

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

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

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

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

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

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

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

1. Storage Area. *Not inspected, under state jurisdiction*

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

e. Special equipment (shields, collimators, etc.)
Remarks.

11. PERSONNEL MONITORING

a. Film or TLD badge supplier. ^{Radiation} Detection Frequency Monthly [L/C]
CO.

b. Reports reviewed by: RSO Frequency: monthly

c. NRC inspector reviewed personnel monitoring records for
period 9/88 to 12/89

d. License exposure limit. 1.25 R/Quarter _____ 3 R/Quarter X

e. NRC forms or equivalent.

(1) NRC-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)] Film badge records missing for two radiogs,
for July 1988 & Oct. 1989

f. Maximum quarterly exposure. _____ Average. 681 mrem

g. Each individual assigned film badge and dosimeter. () Yes
() No [34.33(a)]
Remarks.

h. Dosimeter type. Quartz fiber Range. 0-200 mR

i. 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.

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

12. LEAK TESTS

- a. Leak test method approved. () Yes () No [34.25(c)]
Remarks.
- b. Model of leak test kit. not checked.
- c. Tests 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 6/88 to 12/89.
Remarks.

13. SURVEYS

- a. Area of facility survey conducted to show compliance with
20.105. () Yes () No [20.201(b)]
Remarks. *RSO says surveys were conducted on the
Edwards AFB job.*
- b. Area of facility survey recorded. () Yes () No [20.401(b)]
Remarks. *Survey results not recorded for the 10/26/89
Edwards AFB job.*
- c. NRC inspector reviewed records for period 9/88 ~~to~~ 3/89 & 10/89
- d. Maximum radiation levels in unrestricted areas.
Remarks. *< 2 mR in any one hour*
- 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-of-
storage. () Yes () No
Remarks.

14. POSTING AND LABELING

not inspected; RSO says the required documents are with each

a. High Radiation Area posted as required. () Yes () No *radiographer*
[20.203(c)(1)]
Remarks.

RSO asked for a copy of NRC Form 3

b. Radiation Area posted as required. () Yes () No [20.203(b)]
Remarks.

c. Use or storage area posted "Caution - Radioactive Material".
() 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

none

a. Confirmatory measurements made by inspector. () Yes () No

b. Survey instrument. _____ 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.

- b. Written procedures. () Yes () No
- c. Shipping incidents since last inspection. () Yes () No
- d. Survey of packages when received. () Yes () No [20.205(c)(1)]
Remarks.
- e. Record of survey of packages. () Yes () No [20.401(b)]
Remarks.
- f. Shipment of sources since last inspection. () Yes () No
- (1) Only container authorized by licensee has been used.
() Yes () No
Remarks.
- (2) Shipping papers and package labeling properly completed.
() Yes () No [71.5]
Remarks.
- (3) Licensed material transferred in accordance with [30.41].
() Yes () No
Remarks.
- (4) Record of receipt and transfer. () Yes () No [30.51]
Remarks.

17. TRANSPORTATION (10 CFR 71.5a and 49 CFR 171-178)

- | | <u>Yes</u> | <u>N/A</u> | <u>Vio.</u> |
|--|---|------------|-------------|
| a. Licensee makes shipments of RAM?
Such shipments are:
(<input checked="" type="checkbox"/>) delivered to Common Carriers?
(<input checked="" type="checkbox"/>) transported in licensee's own
vehicle as private carrier?
(<input checked="" type="checkbox"/>) both? | (<input checked="" type="checkbox"/>) | () | () |
| If a. above is "Yes," complete following items: | | | |
| b. Are Authorized Packages used?
[173.415-416]
Types used:
<u>DOT-7A</u> , Type A [173.415] | (<input checked="" type="checkbox"/>) | () | () |
| Performance test records on file?
DOT-55 [173.416(a)] | (<input checked="" type="checkbox"/>) | () | () |

Camera/source used on federal jobs not identified on U-logs.

- Licensee aware of 6/30/85 Cutoff on use?
- Certified [173.416(b)]
- NRC COC's on file? [71.12(c)(1)]
- Registered with NRC as user? [71.12(c)(3)]
- Documented NRC-Approved Q/A program? [71.12(b)]
- NRC Q/A Approval No. _____
- Other _____
- c. Special Form Material Performance test records available for each source design [173.476(a)]
- d. Packages labeled as required? [172.403(a)(b)(c)(e)(f)]
- Excepted WI YII YIII
- Surveys performed to select correct label category and compliance with radiation limits? (175.475(i)).
- e. Packages marked with required, i.e., proper shipping name, Spec. No., COC No., etc. [172.300 thru 172.310]]
- f. Shipping papers prepared for each shipments? [172.200]
- Such papers contain required information [172.203(d)]
- g. For licensee Private Carrier Shipments: Vehicles placarded as required? [172.500, 172.504]
- Cargo blocked, braced, tied down in vehicle? [177.842(d)]
- Any incidents reported to DOT? [171.15-16]
- h. Licensee carries shipping papers that are readily accessible when transporting RAM.

18. NOTIFICATION AND REPORTS

- a. Licensee in compliance with 19.13 (reports to individuals). Yes No [19.13]
Remarks.
- b. Licensee in compliance with 20.405 (overexposures). Yes No [20.405(a)]
Remarks.

- c. Licensee in compliance with 20.403 (incidents).
 Yes No [20.403]
 Remarks. *NA*
- d. Licensee in compliance with 20.402 (theft or loss).
 Yes No [20.402(a)] or [20.402(b)]
 Remarks. *NA*
- e. Annual Report to Commission. Yes No [20.407]
 Remarks. *NA*
- f. Termination Report to Commission. Yes No [20.408]
 Remarks. *NA*

19. LICENSE CONDITIONS

- a. All License Conditions reviewed during inspection. Yes
 No *Those that applied to federal jurisdiction job sit*
- 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
- b. Bulletins and Information Notices received by licensee. Yes
 No
- c. Licensee took appropriate action in response to Bulletins and
 Information Notices. Yes No *NA*
 Remarks.

21. ITEMS OF NONCOMPLIANCE *5 as noted in this report:*

- 241 reciprocity notification; survey meter calibration records; film badge records; quarterly maintenance records; U-logs; quarterly audit records*
22. CONTINUATION OF PREVIOUS PARAGRAPHS - USE BACK OF PAGE IF NECESSARY *records*

INSPECTOR'S REPORT
Office of Inspection and Enforcement

MONTGOMERY, JAMES L
REVIEWER

INSPECTORS
PATE, ROBERT J.

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSPEC. DATE	
			NO	SEQ	MO	YR
Alley Industrial X-RAY 8732 FRUITVALE EXT 1 BAY #7 BAKERSFIELD, CA 93312	<input checked="" type="checkbox"/> I - INSERT <input type="checkbox"/> M - MODIFY <input type="checkbox"/> D - DELETE <input type="checkbox"/> R - REPLACE	15-000004	9007	A		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY						ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See NRC 0530 "Manpower Reporting - Weekly Manpower Reporting" for code)					
FROM			TO			<input checked="" type="checkbox"/> 1 - REGIONAL OFFICE STAFF			OTHER			REGION		DIVISION		BRANCH	
MO	DAY	YR	MO	DAY	YR												
05	21	90	05	21	90							V	C		D		

REGIONAL ACTION (check one box only)		TYPE OF ACTIVITY CONDUCTED (check one box only)														
<input checked="" type="checkbox"/> 1 - NRC FORM 501	<input type="checkbox"/> 2 - REGIONAL OFFICE LETTER	<input type="checkbox"/> 01 - SAFETY	<input type="checkbox"/> 02 - INCIDENT	<input type="checkbox"/> 03 - ENFORCEMENT	<input type="checkbox"/> 04 - MGMT. AUDIT	<input type="checkbox"/> 05 - MGMT. VISIT	<input type="checkbox"/> 06 - SPECIAL	<input type="checkbox"/> 07 - MGMT. VER.	<input type="checkbox"/> 08 - SHIPMENT/EXPORT	<input type="checkbox"/> 09 - IMPORT	<input type="checkbox"/> 10 - PLANT SEC.	<input type="checkbox"/> 11 - INVENT. VER.	<input type="checkbox"/> 12 - SHIPMENT/EXPORT	<input type="checkbox"/> 13 - IMPORT	<input type="checkbox"/> 14 - INQUIRY	<input type="checkbox"/> 15 - INVESTIGATION

INSPECTION/INVESTIGATION FINDINGS (check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS				ENFORCEMENT CONFERENCE HELD				REPORT CONTAINS 2780 INFORMATION				LETTER OR REPORT TRANSMITTAL DATE									
<input checked="" type="checkbox"/> 1 - CLEAR	<input type="checkbox"/> 2 - VIOLATION	<input type="checkbox"/> 3 - DEVIATION	<input type="checkbox"/> 4 - VIOLATION & DEVIATION	A	B	C	D	A	B	C	D	A	B	C	D	A	B	C	D	MO	DAY	YR	MO	DAY	YR
				0	3						1	-	YES				1	-	YES	05	21	90			

MODULE INFORMATION												MODULE INFORMATION																													
REC. ORG.	MODULE NUMBER INSP.				PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL	REC. ORG.	MODULE NUMBER INSP.				PRIORITY	DIRECT INSPECTION EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	PHASE	MANUAL CHAPTER	PROCEDURE NUMBER	LEVEL																
	5	9	2	7	0	2	A						B	5	8	3	8	2	2	A	0	0	5	1	0	0	C														
	Follow up on Previous Violations													Radiation Protection																											
	5	3	0	7	0	3	A	0	0	2	1	0	0	C												B	5	9	2	7	0	3	A								
	Management Meeting Entrance/Exit													Bulletin/IAP Followup																											
	5	8	7	1	0	0	A	0	0	4	1	0	0	C												B	5	8	6	7	4	0	A								
	Materials Inspection Program													Transportation																											
	6	8	3	8	9	0	A							B	5	8	4	8	5	0	A																				
	Close out Inspection													10 CFR 61																											

6 CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

INSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT	MODULE NUMBER						SITE RELATED		
15-000004		9007	871001							VI	
				VIOLATION SEVERITY OR DEVIATION						SITE RELATED	
				1 2 3 4 5 6 0						A C H D	
				X							

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

2 Failure to record utilization log information at
3 10/26/89 job site (Edwards Air Force Base) in
4 accordance with 10 CFR 34.27.

INSPECTOR'S REPORT
 (Continuation)
 Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE
 NO. (BY PRODUCT) (13 digits)

REPORT

MODULE NUMBER

15-000004

9V07

6711001

VI

VIOLATION SEVERITY
 OR DEVIATION

DATE
 RELATED

1 2 3 4 5 6 7 8

A C
 B D

X

X

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 30 characters each.)

Records of survey meter calibration, film badges, quarterly maintenance & audits were not properly maintained as required by 10 CFR 34.24, 34.33, 34.28, & 34.11.

INSPECTOR'S REPORT
(Continuation)
Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT	MODULE NUMBER	
15-000004		9007	87110011	VI
		SECTION	VIOLATION SEVERITY OR DEVIATION	
		A	1	2
		B	3	4
		C	5	6
		D	7	8
			9	10
			11	12
			13	14
			15	16
			17	18
			19	20
			21	22
			23	24
			25	26
			27	28
			29	30
			31	32
			33	34
			35	36
			37	38
			39	40
			41	42
			43	44
			45	46
			47	48
			49	50

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

2 Failure to notify the NRC in accordance with
 3 10 CFR Part 150 of activities of agreement state
 4 licensee at Edwards Air Force Base on 3/24/89 &
 5 10/26/89.