

SEP 19 1989

30-20423

License No.: 50-23257-01

Inspection Services and Testing
611 30th Avenue
P. O. Box 61179
Fairbanks, Alaska 99706

Attention: Mr. Larry Russell, General Manager
and Radiation Safety Officer

Gentlemen:

Please find enclosed NRC Form-591 which indicates one violation that was identified during the safety inspection conducted on August 15, 20 and 21, 1989 of activities authorized by NRC License No. 50-23257-01

Pursuant to the provisions of 10 CFR 2.202, you are requested, within 30 days, to sign and date the enclosed NRC Form-591 which indicates that appropriate corrective action will be taken with reference to the violation described on the form. After signing, please detach the first sheet of NRC Form-591 and return the remaining carbon copies with your signature to me at the Region V office.

If you have any questions relative to this matter or concerning this inspection, please feel free to call me at 415-943-3700.

Thank you for your cooperation.

Sincerely,

Original signed by

Paul R. Zurakowski
Radiation Specialist

Enclosure: NRC Form-591

bcc w/o Encl: Central Files, RV

RV PRZ
PZurakowski/cb
9/ 19 /89

Region V

01

GUIDANCE FOR INSPECTION PROCEDURE 87100

INDUSTRIAL RADIOGRAPHY INSPECTION FIELD NOTES

Inspection Report No. 90-01

License No. 04-21031-01

Licensee (name and address)

Docket No. 030-19687

Plant Inspection Company
a Division of U.S. Testing Company, Inc.
2056 Davis St.
San Leandro, CA 94577

Licensee Contact. Robert Green

Telephone No. 502-7500

Last Amendment No. 8

Date of Amendment. Feb 22, 1990

Priority: I Program Code () 03310 - Fixed (✓) 03320 - Temporary

Date of Inspection June 26 & 27, 1990

Type of Inspection () Announced () Initial
(✓) Unannounced (✓) Special
Reinspection
Next Inspection Date June, 1991 (✓) 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

William Cain, AIT RSC
* Robert Green, RSC

* Those present at exit interview.

Inspector J Frank Parr
(Signature)
Approved [Signature]
(Signature)

6/27/90
(Date Signed)
6/28/90
(Date Signed)

6/11

1. ORGANIZATION

a. Management Structure

John McCormack, Sr. Vice President
William E. Owen, Vice President & att. RSC
Robert E. Green, RSC

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

Radiographers

Radiographer's Assistants

Hiestand, William
Byrnes, Mark
Brennan, Debra
See opposite page.
(continue d., if needed, on paragraph 22.)

2. INSPECTION HISTORY

a. Item(s) of noncompliance or deviations noted during last inspection conducted on Oct. 20, 1989 () Yes () No
Corrected by letter dated N.A.

<u>Requirement</u>	<u>Severity</u>	<u>Corrected</u>	<u>Status</u>
Failure to notify NRC of change in ownership	5	<input checked="" type="checkbox"/>	Closed

(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

The licensee has a small field operation in East Chicago, Indiana utilizing the full time services of 2 radiographers and 1 assistant. This operation began about April, 1990.

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. Licensee

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.A.

The program in East Chicago, Indiana began about April, 1990 and the year has not yet run out.
n. Retraining program implemented: () Yes () No [L/C]
Remarks. N.A.

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

- 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.

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.

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 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.

9. QUARTERLY INVENTORIES

a. Quarterly physical inventories conducted. () Yes () No N/A. [34.26]

Remarks.

A quarterly period has not yet passed since the field site acquired their sources.

b. Quarterly inventories contain all information. () Yes () No N/A. [34.26]

Remarks.

c. Materials possessed authorized by the license. (✓) Yes () No

Remarks.

d. Byproduct Material inventory on. June 25, 1990

Source

Changer

Model #	Quantity	Isotope	Source S/N	Camera Model	S/N
Teche Cp.	1	Ir-192		660	2583
" "	1	Ce-60		680	202

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. N/A. This license doesn't authorize a fixed facility

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. N.A.

(2) Entrance controlled in accordance with 20.203(c)(2).

() Yes () No [20.203(c)(2)]

Remarks. N.A.

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

[20.203(c)(3)]

Remarks. N.A.

(4) Surveillance or locked to prevent unauthorized entry.

() Yes () No [20.203(c)(4), 34.41]

Remarks. N.A.

(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 radiation; audible when entrance attempted during source exposure. [34.29(b)]

Remarks. N.A.

(6) Alarm system tested at 3 month intervals. () Yes () No

[34.29(c)]

Remarks. N.A.

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

Remarks.

N.A.

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

Remarks.

N.A.

b. Storage Area.

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

Remarks.

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

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

c. Field Location

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

(2) Field inspection conducted. () Yes (✓) No

(3) Proper postings (signs) ropes, etc., available as required
by regulations or license. (✓) Yes () No
Remarks.

According to the RSO who

d. Survey Meters

(1) Calibrated and operable meters available and used:
(✓) Yes () No [34.43(c)]
Remarks.

(2) Type and number available.

The field site currently has three survey meters.

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

(4) Calibrated by. Industrial Nuclear Inc.

(5) Calibration method authorized. (✓) Yes () No [L/C]
Remarks.

(6) Calibrated at 3-month intervals. (✓) Yes () No [34.24]
Remarks.

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

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11. PERSONNEL MONITORING

a. Film or TLD badge supplier. Red Det Co. Frequency Monthly [L/C]

b. Reports reviewed by: RSC Frequency: Monthly

c. NRC inspector reviewed personnel monitoring records for period April, 1990 to May, 1990

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

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)]

f. Maximum ^{wholebody} ~~quarterly~~ exposure. 3rd ~~max~~ ^{through May, 1990.} Average.

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

h. Dosimeter type. Range. 0 - 200 mrem

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. _____
- c. Test at 6-month intervals. () Yes () No [34.25(b)] *N.A.*
Remarks.
New sensors had been purchased for the field site in March/April of 1990.
- d. Record of leak test results maintained. () Yes () No [34.25(c)]
- e. Records reviewed by NRC inspector for period _____ to _____. *N.A.*
Remarks.

13. SURVEYS

- a. Area of facility survey conducted to show compliance with 20.105. () Yes () No [20.201(b)] *N.A.*
Remarks.
This license is for temporary field sites only.
- b. Area of facility survey recorded. () Yes () No [20.401(b)] *N.A.*
Remarks.
- c. NRC inspector reviewed records for period April, 1990 to May, 1990
- d. Maximum radiation levels in unrestricted areas.
Remarks.
≤ 2mR/hr
- 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

- a. High Radiation Area posted as required. (Yes () No [20.203(c)(1)])
Remarks.
- b. Radiation Area posted as required. (Yes () No [20.203(b)])
Remarks.
- c. Use or storage area posted "Caution - Radioactive Material".
(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
- b. Survey instrument. _____ NRC Serial No. W.A
Last date of calibration. W.A
- c. Describe type and results of measurements and compare these with licensee's measurements. W.A

No visit was made to the field site

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:
() delivered to Common Carriers?
() 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:
DOT-7A, Type A [173.415] | (<input checked="" type="checkbox"/>) | () | () |
| Performance test records on file?
DOT-55 [173.416(a)] | () | (<input checked="" type="checkbox"/>) | () |

- Licensee aware of 6/30/85 Cutoff on use?
- | | | | |
|--|-------------------------------------|-------------------------------------|-----|
| <input checked="" type="checkbox"/> Certified [173.416(b)] | () | <input checked="" type="checkbox"/> | () |
| NRC COC's on file? [71.12(c)(1)] | <input checked="" type="checkbox"/> | () | () |
| Registered with NRC as user? [71.12(c)(3)] | <input checked="" type="checkbox"/> | () | () |
| Documented NRC-Approved Q/A program? [71.12(b)] | <input checked="" type="checkbox"/> | () | () |
| NRC Q/A Approval No. _____ | <input checked="" type="checkbox"/> | () | () |
| <input type="checkbox"/> 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] N.A.
 Remarks.

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