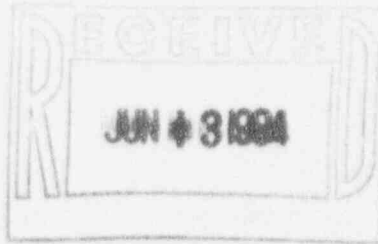


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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MEDICAL OPERATIONS AGENCY
BROOKS AIR FORCE BASE, TEXAS



13 June, 1994

MEMORANDUM FOR USNRC, Region IV
Attention: Ms Linda McLean

FROM: HQ AFMOA/SGPR
8901 18th St
Brooks AFB TX 78235-5217

SUBJECT: Response to USNRC Inspection Report 030-28641/94-04

Attached is the response to the Notice of Violation issued in subject inspection report.

If you have any questions, please contact Capt Montgomery (210) 536-3331. Telefax: (210) 536-4382. E-Mail: montgome@afoms.brooks.af.mil.

Joseph Donnelly
JOSEPH DONNELLY, LtCol, USAF, BSC
Chief, USAF Radioisotope Committee Secretariat
Office of the Surgeon General

Attachment:
SM-ALC/TI-1 Memo, 2 Jun 94

cc:
SM-ALC/TI-1 w/o Atch
HQ AFMC/SGBR w o Atch
HQ AFMOA/SGP/SGPA w/o Atch

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DEPARTMENT OF THE AIR FORCE

HEADQUARTERS SACRAMENTO AIR LOGISTICS CENTER (AFMC)
McClellan Air Force Base, California

2 Jun 94

MEMORANDUM FOR HQ AFMOA/SGPR
ATTENTION: CAPT MONTGOMERY

FROM: SM-ALC/TI-1
5335 Price Ave
McClellan AFB CA 95652-2504

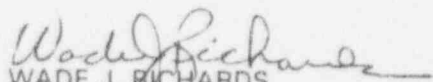
SUBJ: NRC Inspection Report 030-28641/94-04 - INFORMATION MEMORANDUM

REF: (a) HQ AFMOA/SGPR Memo, (same subject), 17 May 94

(b) USNRC Region IV Ltr, 10 May 94

(c) SM-ALC/TI-1 Memo, (same subject), 26 May 94

1. Reference (a) forwarded NRC Inspection Report 030-28641/94-04 (reference (b)) of an inspection conducted on licensed activities authorized by Byproduct Materials License 42-23539-01AF under USAF Radioactive Material Permit No. 04-10117-2AFP (Docket No. 030-22419). Reference (a) requested a response to five violations that were identified in the USNRC inspection of Mar and Apr 94 by 1 Jun 94. Reference (c) forwarded a response in accordance with reference (a). Comments on the response were provided by you via telecon.
2. The Attachment is the revised response to the five violations cited.
3. For further information, contact Jeff Ching, TIRH, at DSN 633-1023.


WADE J. RICHARDS
Chief, Nuclear Licensing and Operations

Attachment:
Reply to a Notice of Violation



REPLY TO A NOTICE OF VIOLATION

- A. 10 CFR 34.32 requires, in part, that the licensee retain a copy of current operating and emergency procedures. These procedures must include instruction in the inspection and maintenance of radiographic exposure devices and storage containers.

Contrary to the above, as of March 10, 1994, the licensee's operating and emergency procedures did not address daily checks or quarterly inspection and maintenance of the Maneuverable Neutron Radiography System (MNRS).

This is a severity Level IV violation (Supplement VI).

- (1) Reason for the violation:

There are existing procedures in place to perform daily checks (see B. below). Although a preventive maintenance (PM) program was addressed in the permit application, it failed to fully implement all of the requirements of 10 CFR 34.32.

- (2) Corrective actions that have been taken and the results achieved:

The Manufacturing Division (TIM) has been tasked to provide written operating and emergency procedures as described in 10 CFR 34.32 (TI-1 ltr, Procedures Required For Permitting MNRS Californium-252 Sources, dtd 25 Apr 94).

- (3) Corrective steps that will be taken to avoid further violations:

The written operating and emergency procedures will contain requirements to perform daily checks and quarterly inspection and maintenance of the MNRS in accordance with 10 CFR 34.28.

- (4) Date when full compliance will be achieved:

December 31, 1994

- B. 10 CFR 34.28(a) requires that the licensee check radiographic devices, storage containers, and source changers for obvious defects prior to use each day the equipment is used.

Contrary to the above, as of March 10, 1994, no routine daily checks of the MNRS had been conducted since the device began operation in October 1989.

This is a severity Level IV violation (Supplement VI).

(1) Basis for disputing the violation:

The following routine daily checks were being performed prior to source operation:

- a. The radiation protection system status panel indications and the radiation monitor on the control console is checked to insure that the sources are in the bunker in accordance with MNRS-0002-DOC-02 (Attachment 1).
- b. The bunker flux monitor is checked to insure that the sources are in the bunker in accordance with Bldg 248 TIRH Checklist (Attachment 2).
- c. The carrier is visually observed during the loading of the source carrier into the moderator collimator system (MCS) to insure proper orientation and correct seating of the carrier locking ring in accordance with MNRS-0011-DOC-00, CN-1 (Attachment 3).

(2) Corrective actions that have been taken and the results achieved:

The Manufacturing Division (TIM) has been tasked to provide written operating and emergency procedures as described in 10 CFR 34.32 (TI-1 ltr, Procedures Required For Permitting MNRS Californium-252 Sources, dtd 25 Apr 94).

(3) Corrective steps that will be taken to avoid further violations:

The written operating and emergency procedures will clarify the requirements to perform daily checks of the MNRS in accordance with 10 CFR 34.28(a).

(4) Date when full compliance will be achieved:

December 31, 1994

- C. 10 CFR 34.28(b) requires, in part, that the licensee conduct a program of inspection and maintenance of radiographic exposure devices and source changers at intervals not to exceed three months to ensure proper functioning of components important to safety.

Contrary to the above, the licensee had not performed such inspections and maintenance on the MNRS and its source handling equipment during 1992 and 1993.

This is a severity Level IV violation (Supplement VI).

(1) Reason for the violation:

Although a preventive maintenance (PM) program was addressed in the permit application, it failed to fully implement all of the requirements of 10 CFR 34.32.

- (2) Corrective actions that have been taken and the results achieved:

The Manufacturing Division (TIM) has been tasked to provide written operating and emergency procedures as described in 10 CFR 34.32 (TI-1 ltr, Procedures Required For Permitting MNRS Californium-252 Sources, dtd 25 Apr 94).

- (3) Corrective steps that will be taken to avoid further violations:

The written operating and emergency procedures will contain requirements to perform quarterly inspection and maintenance of the MNRS and its source handling equipment in accordance with 10 CFR 34.28(b).

- (4) Date when full compliance will be achieved:

December 31, 1994

- D. 10 CFR 34.24 requires, in part, that each survey instrument used to conduct physical radiation surveys be calibrated at intervals not to exceed three months and after each instrument servicing.

Contrary to the above, during routine surveys on February 16, 24, and March 9, 1994, health physics technicians conducted physical radiation surveys with a Nuclear Radiation Corporation, Model NP-2, neutron survey meter last calibrated during March 1993, an interval greater than three months.

This is a severity Level IV violation (Supplement VI).

- (1) Reason for the violation:

Gamma survey meters used to perform radiation surveys in the MNRS facility are calibrated on a three month cycle. It was failed to be recognized that neutron survey meters used to perform surveys in the MNRS facility were also required to be on a three month calibration schedule.

- (2) Corrective actions that have been taken and the results achieved:

Neutron survey meters used at the MNRS have been placed on a 3 month calibration cycle. Health Physics personnel have been brief on this new requirement.

- (3) Corrective steps that will be taken to avoid further violations:

Two additional neutron survey meters are being procured to allow for the increased calibration frequency.

- (4) Date when full compliance will be achieved:

October 1, 1994

- E. 10 CFR 34.25(e) requires that a sealed source which is not fastened to or contained in a radiographic exposure device to have permanently attached to it a durable tag at least (1) inch square bearing the prescribed radiation caution symbol in conventional colors, magenta Material-Do Not Handle-Notify Civil Authorities if Found."

Contrary to the Above, the licensee's californium-252 sources were not fastened to or contained in the MNRS and did not have the prescribed tag.

This is a severity Level IV violation (Supplement VI).

- (1) Basis for disputing the violation:

This item is not considered a violation since the californium-252 sources are always contained or attached to the radiographic exposure device (in this case, the source carrier, the MCS (when the source carrier is loaded), or the bunker (when the sources are in the bunker)) during routine operations. The situation that sources are presently in is a non-routine, emergency one. The only other times when the sources are not attached to the radiographic device are when they are in the storage container (bunker storage tube) during system maintenance or the source changer (Type B shipping container) for source replacement which are both locked to prevent accidental exposure, tampering with, or unauthorized removal of the sources.

- (2) Corrective actions that have been taken and the results achieved:

None.

- (3) Corrective steps that will be taken to avoid further violations:

None.

- (4) Date when full compliance will be achieved:

Not Applicable.