



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011 8064

JUN 21 1994

Docket: 030-28641
License: 42-23539-01AF

Department of the Air Force
ATTN: Lt. Colonel Joseph Donnelly
USAF Radioisotope Committee
HQ AFMOA/SGPR
8901 18th Street
Brooks AFB, Texas 78235-5217

SUBJECT: NRC INSPECTION REPORT 030-28641/94-05 (NOTICE OF VIOLATION)

This refers to the routine, unannounced inspection conducted by Mr. Gilbert L. Guerra, Jr., of this office on May 18-20, 1994. The inspection, conducted at Brooks Air Force Base (AFB), Texas, included a review of activities authorized by Byproduct Materials License 42-23539-01AF under Air Force Permit Nos. 42-30168-1AFP, 42-05834-2AFP, and 42-05834-5AFP. At the conclusion of the inspection, the findings were discussed with Brooks AFB staff members.

The inspection was an examination of activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observation of activities in progress.

The inspector noted that Brooks AFB had a well managed radiation safety program and that the radiation safety officer (RSO) had sufficient authority to ensure compliance. The RSO's staff interacted daily with users of byproduct material and provided needed support such as maintaining survey instrument calibrations; receiving and distributing byproduct material packages; performing compliance audits, including confirmatory radiation and contamination surveys; providing training for radiation workers and ancillary personnel; and managing waste activities. Generally, radiation safety procedures were more restrictive than NRC regulations would require in order to ensure compliance with the regulations and the conditions of the license. Personnel were made aware of their responsibilities and were required to certify in writing that they would maintain control of material in their possession. Also, the radiation safety committee presided over activities conducted under all permits assigned to Brooks AFB even though such a committee is only required for the nuclear medicine permit.

However, based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation (Notice).

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You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

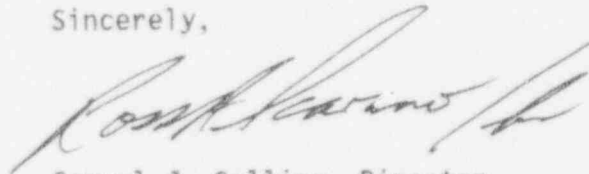
Also reviewed were the actions you had taken with respect to the violations observed during our previous inspection conducted on December 21, 1993. The inspection verified that the corrective actions for these violations had been implemented as stated in your reply received in the NRC Region IV office on March 23, 1994, and that these actions were effective. Specifically, the previous inspection resulted in NRC taking enforcement action for the loss of four strontium-90 sealed sources. The inspector verified that Brooks AFB had implemented effective controls over its sealed source inventory. This was accomplished by reducing the inventory and maintaining only the most needed sources. The inspector noted that the RSO had maintained possession of all sources when not in use. In addition, the permittee's corrective actions included a requirement for users to check a source out from the RSO by signing a document which states their responsibilities relative to the possession of licensed material. Also, 6-month inventories of all sealed sources must now be conducted by two individuals who certify that they have personally accounted for all sources.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Should you have any questions concerning this letter, please contact Charles Cain of my staff at (817) 860-8186.

Sincerely,



Samuel J. Collins, Director
Division of Radiation Safety
and Safeguards

Enclosure:
Appendix - Notice of Violation

cc:
Texas Radiation Control Program Director

bcc:
 DMB - Original (IE-07)
 LJCallan
 SJCollins
 RAScarano
 DWeiss, OC/LFDCB (T-9E10)
 *WLFisher
 *CLCain
 *FAWenslawski
 *GLGuerra
 *MLMcLean
 *NMIB
 *MIS System
 *RIV Files (2)
 SLMerchant, NMSS (T-8F5) w/QMⁿ Field Notes

 *W/IFS Form

RIV:NMIB	NMIB	AC:NMIB <i>etc</i>	DD:DRSS <i>ml</i>	D:DRSS <i>ml</i>
*GLGuerra	*MLMcLean	CLCain	RAScarano	SJCollins <i>ml</i>
05/ /94	05/ /94	06/15 /94	06/21/94	06/21/94

*Previously concurred