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

DEC 01 1992

Docket No. 15000004  
License No. California 2851-07  
EA 92-127

CTI, Inc.  
ATTN: Mr. John F. McGlynn  
President  
2840 Howe Road, Suite C  
Martinez, California 94553-4000

Dear Mr. McGlynn:

SUBJECT: ORDER IMPOSING CIVIL MONETARY PENALTIES - \$12,500

This refers to your October 6, 1992, response to our Notice of Violation and Proposed Imposition of Civil Penalties (Notice) dated September 2, 1992. The Notice described six violations identified by the NRC during an inspection of your operations at Moffett Field, California.

Two of the violations, the failure to use alarm ratemeters set at 500 mR/hr (Violation I.A. in the Notice) and the failure to conduct complete circumferential surveys of an exposure device (Violation I.B.), were of special concern because they demonstrated a significant lack of attention or carelessness toward compliance with NRC requirements. A third violation (Violation I.C.), the failure to post a high radiation area, was also of significant concern because it involved careless disregard of NRC posting requirements.

To emphasize the need for compliance with NRC requirements while operating in areas under Federal jurisdiction, a civil penalty of \$5,000 was proposed for the alarm ratemeter and radiation survey violations, which were categorized as a Severity Level III problem, and a civil penalty of \$7,500 was proposed for the willful posting violation. In your response, you admitted the alarm ratemeter and posting violations, but questioned the validity of the violation concerning the radiographer's failure to survey the circumference of the exposure device. You also protested the severity level of the violations and the amount of the civil penalties proposed.

After consideration of your response, we have concluded, for the reasons given in the Appendix attached to the enclosed Order Imposing Civil Monetary Penalties, that these violations occurred as stated and warrant the proposed civil penalties. Accordingly, we hereby serve the enclosed order on CTI, Inc., imposing a civil penalty in the amount of \$12,500. We will review the effectiveness of your corrective actions during a subsequent inspection.

The three remaining violations of NRC requirements, involving failure to

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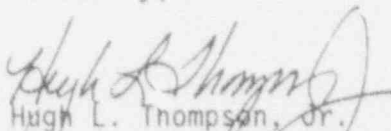
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conduct exposure device inspection and maintenance, failure to register an exposure device with NRC, and failure to obtain NRC quality assurance program approval (Violations II.A, II.B., and II.C., respectively), were categorized as Severity Level IV and V violations and were not assessed a civil penalty. Your response to several violations described in the Notice was inadequate in certain respects. As specified in the Notice, you were requested to include for each alleged violation: (1) your admission or denial of the alleged violation, (2) the reasons for the violations if admitted, and if denied, the reasons why, (3) the corrective steps that have been taken and the results achieved, (4) the corrective steps that have been taken to avoid further violations, and (5) the date when full compliance will be achieved.

Specifically, your response concerning Violations II.A, II.B, and II.C. did not include: admission or denial of each alleged violation, and the reason(s) why each violation occurred, or an explanation for the denial. You also did not specify the results achieved following your corrective steps for Violations II.A. and II.C. Consequently, you should resubmit a written statement or explanation to the NRC Region V office within 30 days of the date of this letter which includes the additional information referenced above.

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

Sincerely,



Hugh L. Thompson, Jr.  
Deputy Executive Director for  
Nuclear Materials Safety, Safeguards  
and Operations Support

Enclosure: As stated

cc: State of California

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*By email*

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YES / NO	YES / NO