

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Enforcement Conference Report Nos. 030-19752/89-002
030-20466/89-002
030-08935/C9-002

Docket Nos. 030-19752
030-20466
030-08985

License Nos. 29-19769-02 Priority 1 Category E3
29-19769-03
29-15364-01

Licensee: Isomedix Incorporated
11 Apollo Drive
Whippany, New Jersey 07981

Enforcement Conference At: Region I, King of Prussia, Pennsylvania

Enforcement Conference Conducted: May 18, 1989

Prepared by:

John J. Miller
John J. Miller
Senior Health Physicist

6/8/89
date signed

Approved by:

John R. White
John R. White, Chief
Nuclear Materials Safety Section C

6/8/89
date signed

Summary: The findings documented in Inspection Report Nos. 030-19752/89-002, 030-20466/89-02, and 030-08985/89-002 were discussed. The licensee described corrective actions taken or planned. The NRC's enforcement policy was explained.

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DETAILS

1. Persons Attending

Isomedix, Inc.

George Dietz, Vice President

Jonathan Young, Corporate Quality Assurance Manager

Nuclear Regulatory Commission

Malcolm R. Knapp, Director, Division of Radiation Safety and Safeguards

James H. Joyner, Division Project Manager

Lee H. Bettenhausen, Chief, Nuclear Materials Safety Branch

John R. White, Chief, Nuclear Materials Safety Section C

Daniel J. Holody, Enforcement Officer

Jenny Johansen, Senior Enforcement Specialist

Francis M. Costello, Senior Health Physicist

John J. Miller, Senior Health Physicist

2. Conference Summary

- a. Introductions were made, and the representatives of Isomedix, Inc. were welcomed to Region I by Malcolm R. Knapp, Director, Division of Radiation Safety and Safeguards. Dr. Knapp explained the purpose and format of the conference. He indicated that the apparent violations would be reviewed one at a time, therefore providing the licensee an opportunity to describe the underlying cause of each violation, provide any mitigating circumstances, and describe the corrective action that is planned or has been implemented.
- b. John J. Miller, Senior Health Physicist, presented the findings of the inspections conducted at the licensee's Northborough, Massachusetts and Parsippany, New Jersey facilities on August 19, 20, and 25, 1987. After each apparent violation was stated, the licensee discussed the causal factors and their proposed corrective action.
- c. George Dietz, Executive Vice President of Isomedix, Inc., stated that the violations cited in the inspection report were factually accurate, but he felt the Investigation Report Synopsis could have been supplemented to more accurately characterize his actions. He stated the licensee's actions were not intended to compromise safety but were a substitution of an alternative procedure for the radiation monitor. Mr. Dietz stated that although the maze monitor and associated interlock were removed from the Parsippany facility, several other safety systems and access procedures remained in place. He indicated the following for consideration:
 - Operators were instructed to check the position of the source hoist cylinder near the console to determine the source position prior to entering the irradiator.

- The lights on the control console panel indicate the position of the source.
- The source hoist cylinder must be seated properly in the down position to trip the microswitch that unlocks access door.
- There is a warning light at access door.
- Operators are instructed to take a radiation measurement at the access door prior to entering.
- The pneumatic hose that supplies air to the source hoist cylinder must be uncoupled to enter cell.
- The "two man-two survey meter" entry procedure, though not valid relative to regulatory requirements, was required to enter cell; and the survey meters were equipped with audible indicators.

Mr. Dietz stated that the licensee was misguided in thinking that these safeguards and procedures provided adequate coverage while the maze monitor was being repaired.

- d. John R. White, Chief, Nuclear Materials Safety Section C, asked Mr. Dietz if Isomedix had ever implemented the "two man-two survey meter" entry procedure in lieu of the maze monitor interlock at any of their other facilities. Mr. Dietz stated that this procedure had been implemented in a facility in Canada, but not at any facilities in the U.S., except Parsippany.
- e. Jonathan Young addressed the other two apparent violations that occurred at the Parsippany facility. He stated that the licensee underwent a reorganization involving personnel transfers during the period when the surveillances were not maintained current.
- f. George Dietz described the circumstances concerning the by-passing of the ventilation system interlock at the Northborough facility. He stated that the use of jumper cables was unknown to the plant manager as well as the corporate staff. It was an unauthorized use by a maintenance man. Mr. Dietz stated that he described the event to all his plant managers and he forbid the use of jumper cables. Mr. Dietz agreed to submit to John White copies of correspondence he had issued addressing this incident.
- g. Mr. Dietz stated that as a corrective action, the licensee had implemented an aggressive self audit program to assure compliance. He stated that their goal was to audit each facility at least once each year. He furnished the NRC a copy of audit checklist that was being used as a basis for the audits.
- h. At the conclusion of the Enforcement Conference, Daniel Holody, Enforcement Specialist, reviewed the enforcement options available to the NRC.