



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

DEC 10 1992

Report No.: 52-17776-02/92-01

License No.: 52-17776-02

Docket No.: 030-20896

Licensee: Geo Cim, Inc.
P. O. Box 447
Hato Rey, PR 00919

Inspection Conducted: November 17, 1992

Inspector: C. M. Hosey
J. L. Henson, Radiation Specialist

12/9/92
Date Signed

Approved by: C. M. Hosey
C. M. Hosey, Chief
Nuclear Materials Inspection Section
Nuclear Materials Safety and Safeguards Section
Division of Radiation Safety and Safeguards

12/9/92
Date Signed

SUMMARY

Scope:

This unannounced inspection was conducted to review the security of licensed material observed by the inspector in an unrestricted area.

Results:

Several weaknesses were identified in the radiation safety program. Of primary concern is the failure to secure licensed material in an unrestricted area from unauthorized removal or to maintain this material under constant surveillance and immediate control of the licensee.

Within the areas inspected, the following apparent violations were identified:

- Failure to secure licensed material in an unrestricted area from unauthorized removal or to maintain the material under constant surveillance and immediate control of the licensee (Section 2.a).
- Failure to store licensed material for overnight storage in the required location (Section 2.b).
- Failure to incorporate a feature on a Type A package that is evidence that the package has not been opened (Section 3).

REPORT DETAILS

1. Persons Contacted

Licensee Employees

*L. Garcia, President and Radiation Safety Officer
D. Diaz, Gauge Operator

*Attended telephonic exit interviews, November 23, 1992 and December 1, 1992.

2. Licensed Materials Program (87100)

- a. 10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area be secured against unauthorized removal from the place of storage. 10 CFR 20.207(b) requires that materials not in storage be under constant surveillance and immediate control of the licensee. As defined in 10 CFR 20.3(a)(17), an unrestricted area is any area access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

The inspector observed a licensee pick-up truck parked on a residential street with what appeared to be a package of licensed material in the back of the open bed of the truck. The package was covered with a yellow, vinyl cover and was secured from movement during transport by a nylon rope. The inspector performed a radiation survey of the package and determined that it contained radioactive material. The inspector maintained surveillance of the package. After approximately 30 minutes, a licensee employee exited the residence where the truck was parked. The inspector identified himself and asked that the employee uncover the package. The inspector determined that the package contained a Campbell Pacific Nuclear Model MC-1 moisture-density gauge, serial number M17087835, which contained approximately 50 millicuries of Americium 241 and 10 millicuries of Cesium 137. The package that contained the gauge was not locked, and the key to the lock in the gauge handle was in the box with the gauge.

Through discussion with the licensee employee, the inspector determined that the truck had been parked on the street in front of the employee's residence for at least one hour.

Failure of the licensee to secure licensed material in an unrestricted area from unauthorized removal or to maintain the material under constant surveillance and immediate control of the licensee was identified as an apparent violation of 10 CFR 20.207.

- b. Condition 17 to License No. 52-17776-02, requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application dated November 9, 1983, and the letter dated February 23, 1984, including any enclosures. On page two of the letter and in an enclosure to the license application entitled 15 - Radiation Protection Program, the licensee states that the gauges will be returned daily to their office for overnight storage.

Through discussions with the licensee employee, the inspector determined that the employee was working at a temporary job site near his residence. While working at this job site, the employee was storing the gauge overnight at his residence. The employee did not plan to return the gauge to the licensee's office until his work at the temporary job site was finished.

Failure of the licensee to return the licensed material daily to his office for overnight storage was identified as an apparent violation of Condition 17 to License No. 52-17776-02.

3. Transportation Activities (86740)

10 CFR 71.5(a) requires each licensee who transports licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, to comply with the applicable regulations appropriate to the mode of transport of Department of Transportation (DOT) in 49 CFR Parts 170 through 189.

49 CFR 173.412(b) requires, in part, that the outside of a Type A package incorporate a feature, such as a seal, that is not readily breakable, and that, while intact, is evidence that the package has not been opened.

The inspector determined that the package that contained the gauge was a DOT 7A, Type A package. The inspector also determined that the package in the truck was not locked and had no other feature which while intact, would serve as evidence that the package had not been opened.

Failure of the licensee to incorporate the required feature on the outside of the package to serve as evidence that the package had not been opened was identified as an apparent violation of 10 CFR 71.5(a).

4. Exit Interview

On November 23, 1992, and December 1, 1992, the inspector telephonically discussed the inspection findings with the President of Geo Cim. The licensee was informed of the three apparent violations of regulatory requirements identified during the inspection. No dissenting comments were made by the licensee.

ENCLOSURE 2

ENFORCEMENT CONFERENCE AGENDA

Geo Cim, Inc.
Hato Rey, Puerto Rico

December 22, 1992
9:00 a.m.

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| I. Introduction and Opening Remarks | NRC and Licensee |
| II. Discussion of the Enforcement Policy | NRC |
| III. Overview | NRC |
| IV. Apparent Violations and NRC Concerns | NRC |
| V. Licensee Presentation | Licensee |
| * * * BREAK * * * | |
| VI. NRC Followup Questions | |
| VII. Closing Remarks | NRC/Licensee |