

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

NRC Inspection Report: 30-20880/88-02

Operating License: 35-23304-01

Docket: 30-20880

Licensee: Hole Truth, Inc.  
P. O. Box 94570  
Oklahoma City, Oklahoma 73143

Inspection At: 1400 S.E. 25th Street, Oklahoma City, Oklahoma

Inspection Conducted: September 23, 1988

Inspector:

*Lorenzo Wilborn*

Lorenzo Wilborn, Radiation Specialist, Nuclear  
Materials Inspection Section

*10/20/88*  
Date

Approved:

*Dale A. Powers*

Dale A. Powers, Chief, Nuclear Materials  
Inspection Section

*10/21/88*  
Date

Inspection Summary

Inspection Conducted September 23, 1988 (Report 30-20880/88-02)

Areas Inspected: This special, unannounced inspection included a review of the radiation protection program, transportation activities, and licensed program requirements with emphasis on corrective actions taken as a result of violations identified during the last inspection and licensee commitments made during an enforcement conference.

Findings: No violations or deviations were identified. Of the 15 apparent violations identified during the July 14 and 15, 1988, inspection, 11 could be considered closed, while 4 remain open pending further review by NRC.

DETAILS1. Persons Contacted

L. D. Robertson, Owner, Radiation Safety Officer  
Helen L. Robertson

2. Followup on Previous Inspection Findings (July 14 and 15, 1988)

(Closed) Violation of 10 CFR 30.34(c): Storage of licensed material at an unlicensed address. The licensee's corrective action was a submittal of a request to amend License 35-23304-01 to delete the use location 1800 South Missouri, Oklahoma City, Oklahoma, and add the use location 1400 S.E. 25th Street, Oklahoma City, Oklahoma. The amendment application was received in the Region IV office on August 31, 1988.

(Closed) Violation of License Condition 19 (Section 2, Part VI.C.9 and VI.F.10 of the operating procedures submitted with the license application dated September 22, 1983): Failure to store license material according to operating procedures. A review of the licensee's utilization records indicated proper storage of licensed material during the period of this inspection. The NRC inspector observed on September 23, 1988, that all inventoried licensed material was accounted for in storage bunkers.

(Closed) Violation of 10 CFR 20.105(b): Radiation levels exceeding allowable limits in an unrestricted area. A review of the licensee's direct radiation surveys for July and August 1988 revealed acceptable radiation levels in the unrestricted areas. These levels were verified by the NRC inspector on September 23, 1988.

(Closed) Violation of License Condition 19 (Section 2, Part IX.B.4.c.3 of the operating procedures submitted with the license application dated September 22, 1983): Failure to label items contaminated with radioactive material in accordance with the operating procedures. The NRC inspector observed on September 23, 1988, that the licensee's items contaminated with radioactive materials were labeled as required.

(Closed) Violation of License Condition 19 (Item 12 of the license application dated September 22, 1983): Failure to return personnel monitoring devices for processing at the proper interval. The NRC inspector observed on September 23, 1988, that the licensee had returned personnel monitoring devices for the monthly wear periods January 1-31, 1988 through August 1-31, 1988, and had received vendor reports for the wear period ending July 31, 1988. On the date of the inspection, the licensee had not received the August report.

(Open) Violation of License Condition 19 (Section 2, Part II.A.5 of the operating procedures submitted with the license application dated September 22, 1983): Failure to maintain complete personnel monitoring records. The licensee had requested, by letter dated August 10, 1987,

that the vendor send copies of personnel monitoring reports for August and September 1987 and December 1986. The inspector observed on September 23, 1987, that vendor reports were not available for wear periods of December 1-31, 1986, through June 1-30, 1987; August 1-31, 1987; and December 1-31, 1987. The licensee reported that another request would be made immediately to the vendor for those reports not available on September 23, 1988.

(Closed) Violation of License Condition 19 (Section 2, Part II.B.2 of the operating procedures submitted with the license application dated September 22, 1983): Failure to perform radiation surveys at job sites. The NRC inspector reviewed records of radiation surveys on September 23, 1988, which indicated that radiation surveys at job sites had been performed and documented during the period covered by this inspection.

(Closed) Violation of License Condition 19 (Section 2, Part III.B of the operating procedures submitted with the license application dated September 22, 1983): Failure to perform radiation surveys upon receipt of licensed materials. The NRC inspector reviewed records of radiation surveys on September 23, 1988, which indicated that radiation surveys upon receipt of licensed material had been performed and documented during the period covered by this inspection.

(Closed) Violation of License Condition 19 (Section 2, Part IV.D of the operating procedures submitted with the license application dated September 22, 1983): Failure to perform radiation surveys before transportation of licensed material. The NRC inspector reviewed records of radiation surveys on September 23, 1988, which indicated that radiation surveys before transporting licensed material had been performed and documented during the period covered by this inspection.

(Closed) Violation of License Condition 19 (Section 2, Part I.A.1 of the operating procedures submitted with the license application dated September 22, 1983): Failure to perform monthly radiation surveys of storage areas. The NRC inspector reviewed records of radiation surveys on September 23, 1988, which indicated that radiation surveys of storage areas had been conducted on July 1 and August 1, 1988. The licensee acknowledged that the monthly radiation survey of storage areas for September was pending.

(Closed) Violation of 10 CFR 30.51(a): Failure to maintain complete records of receipt of licensed material. The NRC inspector observed on September 23, 1988, that the licensee had maintained records of the receipt of licensed material received during the period covered by this inspection.

(Closed) Violation of 10 CFR 39.39: Failure to maintain complete records of use of licensed material. The NRC inspector observed on September 23, 1988, that the licensee had maintained records of use of licensed material during the period covered by this inspection.

(Open) Violation of License Condition 19 (Section 2, Part VII.3 of the operating procedures submitted with the license application dated September 22, 1983): Failure to maintain complete records of waste disposal. The licensee had not made a disposal during the period covered by this inspection. The NRC inspector observed on September 23, 1988, that the procedure for properly disposing of licensed material and the mechanism for recording such disposals were in place.

(Open) Violation of 10 CFR 71.5(a) and 49 CFR 177.842(d): Failure to properly brace radioactive material during transportation on public highways. The NRC inspector did not observe on September 23, 1988, the licensee's bracing of radioactive material for transport, but did discuss the licensee's procedure which appeared to be adequate.

(Open) Violation of 10 CFR 71.5(a) and 49 CFR 173.415(a): Failure to transport radioactive material in the proper shipping container. The licensee had no radioactive material prepared for transport on September 23, 1988. The NRC inspector observed that the licensee possessed proper shipping containers for transport of radioactive material.

3. Licensee Commitments

During an enforcement conference held on August 30, 1988, the licensee committed to having his (a) consultant inspect his operations on a quarterly basis for at least 1 year and (b) wife aid in the management of the radiation safety records. The NRC inspector observed on September 23, 1988, that the consultant had not performed the first of the quarterly inspections of the licensee's operations, but the licensee stated that he expected that the inspection would be conducted any day. The NRC inspector noted on September 23, 1988, that Helen L. Robertson had successfully completed a radiation safety course and was present to discuss the licensee's record management requirements.

4. Exit Meeting

The NRC inspector met with the individuals identified in paragraph 1 at the conclusion of this inspection and summarized the findings of this inspection as presented in this report.