

## UNITED STATES

## NUCLEAR REGULATORY COMMISSION

REGION IV

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

January 30, 1998

Beverly S. Ozmun, President Globe X Ray Services, Inc. 8441 South Union Street Tulsa, Oklahoma 74132

SUBJECT: NRC INSPECTION REPORT 030-08719/98-01

Dear Ms. Ozmun:

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ADOCK 03008719

PDR

On January 14, 1998, the NRC conducted an inspection at your Broken Arrow and Port of Catoosa, Oklahoma, facilities. The inspection included a review of activities authorized by Byproduct Materials License 35-15194-01. Additionally, a telephonic exit briefing was subsequently conducted with Mr. David Potter of your staff on January 22, 1998.

Within the scope of this inspection, no violations were identified; however, two areas of concern, for which a written response is requested, were identified at your Broken Arrow radiographic facility.

The first concern relates to the testing of the electronic eye used to monitor a path which could provide members of the public access to a high radiation area located outside of the building containing the radiography exposure vault. When the beam of the electronic eye is broken, an audible alarm is sounded to alert the radiographer to return the source to a fully shielded position. During the course of the inspection, an inspector discussed with your radiographer the procedure used to test operation of the electronic eye. The radiographer responded that the procedure requires that he test the eye on each day of use. He further explained that to test the eye he would crank out the source, quickly move away from his shielded position within the exposure vault, exit the building, and break the beam with his hand. The radiographer would then quickly return to his shielded position to crank the source back to its fully shielded position within the camera. The inspector asked the radiographer if the procedure would activate his alarming rate meter. The radiographer initially responded that it did, but later clarified his statement indicating that the actions usually only caused the meter to "chirp." Your procedures require that alarming rate meters be set to continuously sound if exposed to a 500 millirem per hour (mrem/hr) field; additionally, the meters are set to chirp when exposed to a 450 mrem/hr field. The NRC is concerned with this practice of exposing an occupational worker to a high radiation area as part of a test procedure. You are requested to review this procedure and determine if an alternative test procedure could be conducted which would eliminate such exposures. During the telephonic exit, Mr. Potter indicated that a review had been initiated and that a written response to this letter would be provided to the NRC within 30 days of its receipt.

The second concern relates to the adequacy of the electronic eyes and other design features that were intended to control access to the high radiation area as required by 10 CFR 34.33(a). The Broken Arrow facility, although licensed as a permanent radiographic installation, consisted



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of an exposure vault which does not meet the requirements of a permanent radiographic installation as specified in 10 CFR 34.33(a). The review of documents submitted to support the licensing of the exposure vault appeared to show adequate barriers to prevent undetected access to the high radiation area. However, the inspectors determined that undetected access to the high radiation area was possible by stepping outside of the path monitored by electronic eyes associated with the main entrance to the facility. Therefore, please respond to this letter by describing measures you will implement to meet the requirements of 10 CFR 34.33(a). If changes to the facility or procedures will be needed, it may be necessary to amend your license. Additionally, until the facility or procedural modifications are approved, you are required to meet the surveillance requirements of 10 CFR 34.51.

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

Should you have any questions concerning this inspection, please contact Jeffrey Cruz at (817) 860-8164 or D. Blair Spitzberg, Ph.D. at (817) 860-8191.

Sincerely,

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Ross A. Scarano, Director Division of Nuclear Materials Safety

Docket No.: 030-08719 License No.: 35-15194-01

cc: Oklahoma Radiation Control Program Director Globe X-Ray Services, Inc.

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