

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 030-06728/86002(DRSS)

Docket No. 030-06728

License No. 48-02844-01

Priority I

Category C

Licensee: Grade Foundries, Inc.
Metallurgical Department
1320 South First
Milwaukee, WI 53204

Inspection At: 1320 South First and 9898 Blue Mound Road
Milwaukee, Wisconsin Wauwatosa, Wisconsin

Inspection Conducted: October 8, 9, 27 and 28, 1986

Enforcement Conference: November 20, 1986

Inspectors: T. L. Simmons *T. L. Simmons*
Radiation Specialist

November 24, 1986
Date

David Galanti *DM Galanti*
Special Projects

November 25, 1986
Date

Reviewed By: D. J. Sreniawski, Chief *D. J. Sreniawski*
Nuclear Materials Safety
Section 2

November 24, 1986
Date

Approved By: W. L. Axeison, Chief *W. L. Axeison*
Nuclear Materials Safety
and Safeguards Branch

11/24/86
Date

Inspection Summary

Inspection conducted October 8, 9, 27 and 28, 1986 (Report No. 030-06728/86002(DRSS))

Areas Inspected: Special safety inspection conducted to review the validity of statements made by the licensee in the support of an amendment request. The inspection included a review of procedures, records, training and interviews with personnel.

Results: Of the areas inspected three violations were identified:

8612050301 861126
REG3 LIC30
48-02844-01 PDR

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 030-06728/86002(DRSS)

Docket No. 030-06728

License No. 48-02844-01

Priority I

Category C

Licensee: Grede Foundries, Inc.
Metallurgical Department
1320 South First
Milwaukee, WI 53204

Inspection At: 1320 South First and 9898 Blue Mound Road
Milwaukee, Wisconsin Wauwatosa, Wisconsin

Inspection Conducted: October 8, 9, 27 and 28, 1986

Enforcement Conference: November 20, 1986

Inspectors: T. L. Simmons *T. L. Simmons*
Radiation Specialist

November 24, 1986
Date

David Galanti *David Galanti*
Special Projects

November 25, 1986
Date

Reviewed By: D. J. Sreniawski, Chief *D. J. Sreniawski*
Nuclear Materials Safety
Section 2

November 24, 1986
Date

Approved By: W. L. Axelson, Chief *W. L. Axelson*
Nuclear Materials Safety
and Safeguards Branch

11/24/86
Date

Inspection Summary

Inspection conducted October 8, 9, 27 and 28, 1986 (Report
No. 030-06728/86002(DRSS))

Areas Inspected: Special safety inspection conducted to review the validity
of statements made by the licensee in the support of an amendment request.
The inspection included a review of procedures, records, training and interviews
with personnel.

Results: Of the areas inspected three violations were identified:

8612050301 861126
REG3 LIC30
48-02844-01 PDR

1. License Condition No. 16 - required exposure log was completed and signed by an individual other than the one who performed the radiography (Section 6).
2. License Condition No. 11 - An unauthorized and unqualified individual performed radiography (Section 6).
3. Section 186 of Atomic Energy Act of 1954, as amended - the licensee submitted misleading information in an amendment request dated June 5, 1986 and in a followup letter received September 11, 1986 which contained altered examination submitted as evidence of an individuals qualifications (Section 5).

DETAILS

1. Persons Contacted

*Bipin Shah, Technical Director
*Gary Ertel, Assistant to the Treasurer
Richard San Felipe, Radiation Safety Officer/Chief Radiographer
George, Rasic, Chief Chemist/Radiographer
Dodd Strong, Manager Quality Assurance
Christine Walloch, Magnaflur Operator
Raymond Sabin, Inspection Welding Foreman
Earl Banfield, Corporate Radiation Safety Officer, MQS
Ed Bielecki, Manager, MQS Milwaukee Office
Gordon Lederhaus, Radiographer Monitor MQS Milwaukee Office
Dan Rankovich, Former Radiation Safety Officer, Wehr Steel

*Attended exit interviews on October 28, 1986.

2. Purpose of Inspection

The special safety inspection was conducted at the request of the NRC Region III materials licensing section to review certain misleading information supplied by the licensee in support of an amendment request to add a radiographer to its license.

Region III Materials Licensing Section received a letter dated June 5, 1986, from the licensee requesting that Ms. Christine Walloch be added to Grede's license as a radiographer. The letter indicated that Ms. Walloch had been a radiographer at Wehr Steel, had taken and passed the Magnaflux Quality Services Radiation Safety and Control Program and had passed the licensee's Emergency Procedures Test. Upon checking the Wehr Steel license, the reviewer learned that Ms. Walloch was not listed as an authorized user (radiographer). A deficiency letter dated August 14, 1986 was sent to the licensee from the NRC Region III office requesting documentation of Ms. Walloch's Magnaflux training and confirmation that she had been instructed in Grede's operating and emergency procedures and had demonstrated competence in the use of their radiographic devices. The licensee responded in a letter received September 11, 1986. A test taken by Christine Walloch at Magnaflux Quality Services entitled "Radiation Safety Control Program - "Assistant Radiographer Examination" was submitted with the licensee's response. The word "Assistant" had been crossed out.

3. License Program and Enforcement History

NRC Byproduct Material License No. 48-02844-01 was originally issued to Grede Foundries, Inc. on July 8, 1957, to possess 500 millicuries of cobalt-60 for use in industrial radiography in a fixed facility. On June 22, 1959 the licensee received authorization to possess and use cobalt-60 and iridium-192 sealed sources contained in a Budd Model 52 Multitron camera for industrial radiography. The license was last renewed in its entirety on May 1, 1986. This program is limited in that authorized users are specifically named on the license and radiographic operations are confined to a fixed facility.

Over the last 29 years the licensee has been inspected 24 times. The last inspection was conducted on April 21, 1986, two violations were identified; (1) failure to maintain a record of an internal audit inspection of one radiographer and (2) failure to maintain a record of special form performance test.

4. Organization

William Irvine, Vice President, Steel
Bipin Shah, Technical Director
Dodd Strong, Manager Quality Assurance
Richard San Felipe, Radiation Safety Officer (RSO)

5. (a) Materials Licensing Concern: Licensee letter dated July 5, 1986 signed by Mr. Gary Ertel, stated that Ms. Walloch was a radiographer at Wehr Steel foundry in Milwaukee.

Interview with Mr. Gary Ertel

Mr. Ertel stated that he received a handwritten memo dated June 4, 1986, from Mr. Richard San Felipe, Radiation Safety Officer (RSO) requesting that Mr. Christine Walloch be added to Grede Foundries, Inc., material license as a radiographer (see Attachment A for memo). The RSO suggested that Mr. Ertel contact the NRC if there were any questions. Mr. Ertel contacted the NRC and was advised to include in the amendment request, confirmation of Ms. Walloch's instruction in Grede's Operating and Emergency Procedures. Following his conversation with NRC personnel, Mr. Ertel composed the amendment request and sent a copy to the RSO with a note asking the RSO to let him know when Ms. Walloch had received the operating and emergency procedures instruction and he would then send the request to NRC. At some later time Mr. Ertel received the copy from the RSO with a note stating "She passed." Mr. Ertel subsequently mailed the amendment request to the NRC Region III office (see Attachment B for June 5, 1986 licensee letter).

As assistant to the Treasurer, Mr. Ertel has an administrative position in the corporate offices. He has no involvement in the radiography program and therefore did not attempt to verify any of the information supplied by the RSO.

According to Mr. Ertel, the only reason he composed and signed the amendment request is because he is responsible for paying the licensing fee (see Attachment C for Ertel Report of interview).

Interview with RSO

The RSO claimed total responsibility for providing the information to Mr. Ertel found in memo dated June 5, 1986. The RSO thought that Ms. Walloch had been certified as a radiographer at Wehr Steel, her previous place of employment. He admitted that he did not attempt to verify Ms. Walloch's training and experience. Based on information

obtained from others and the fact that she was a Level II radiographer*, the RSO assumed that Ms. Walloch was sufficiently qualified to be added to Grede's license as a radiographer. The RSO did not meet Ms. Walloch until June 16, twelve days after the memo was sent to Mr. Ertel. The RSO stated that after he sent the memo to Mr. Ertel he heard nothing further about the amendment until he received a deficiency letter in August 1986.

The statement that Ms. Walloch was a radiographer at Wehr Steel implied that Ms. Walloch had been listed on the Wehr license as an authorized user of byproduct material and therefore, had met the training criteria specified in 10 CFR 34:31. According to Mr. Dan Rankovich, former RSO at Wehr Steel, Ms. Walloch was hired as a radiographer at Wehr Steel; however, she functioned as an X-ray unit operator. As a point of clarification the inspector contacted Mr. Richard McQuire of the American Society of Non-destructive Testing (ASNT) to find out what the term radiographer means to his group. He stated that any user of a penetrating beam is considered a radiographer.

The RSO's failure to verify Ms. Walloch's credentials coupled with Mr. Ertel's unfamiliarity with radiography operations resulted in a false statement being made to the NRC licensing reviewer.

- (b) Materials Licensing Concern - The June 5, 1986 request stated that Ms. Walloch had taken and passed the Magnaflux Radiation Safety and Control Program. The NRC reviewer requested documentation of the course. The licensee sent a copy of Ms. Walloch's assistant Radiographer examination with the word "assistant" crossed out. This information was received on September 11, 1986 as an enclosure to a letter signed by the RSO (see Attachment D exam).

Interview with RSO

The RSO admitted that he crossed out the word assistant on Ms. Walloch's assistant radiographer examination. The RSO stated that he needed a radiographer not an assistant. He also indicated that he was unaware there was a difference in examinations for assistant radiographers or radiographers. By submission of the test in its altered state the license attempted to mislead the NRC into authorizing use of licensed material by an individual who had not met specific NRC regulatory requirements. Submission of false information to the NRC in support of an amendment request is in violation of Section 186 of the Atomic Energy Act of 1954, as amended.

*Level II radiographer is a term used in connection with the American Society of Non-destructive Testing (ASNT). It means that the individual is certified to interpret film, graphs, charts etc., produced as the result of performing some test such as X-ray and ultrasound, but, not including byproduct material radiography.

The RSO stated that although he made a mistake in not verifying Ms. Walloch's training and altering her assistant radiographer examination, he did not intentionally try to mislead the NRC (see Attachment E for RSO report of interview).

One violation was identified.

6. Additional Inspection Findings:

It was learned that during the RSO's absence in August 1986 Ms. Walloch acted as radiographer at Grede Foundries, Inc.

Interview with Ms. Christine Walloch

Approximately one week before the RSO went on vacation, Ms. Walloch was told by Mr. Dodd Strong, Manager of Quality Assurance, that she might be needed "to shoot" (perform radiography) during the RSO's absence. She asked Mr. Strong if she was on the license. He said he was not sure but he would check. Mr. Strong returned shortly (within ten minutes) and assured her that it was okay to shoot. From that conversation Ms. Walloch was under the impression that she was authorized to perform radiographic operations. The RSO's vacation started on August 4, 1986. On August 6, 7, and 8, 1986 Ms. Walloch performed radiography work with NRC licensed byproduct material. Mr. George Rasic, an authorized user who serves as alternate radiographer, initially helped Ms. Walloch set up and observed her performance of five or six exposures. Once he felt comfortable with her work he left the cell and allowed her to continue alone. However, he did check on her progress periodically each day. Mr. Walloch estimated that she performed thirty to forty exposures alone. Ms. Walloch was not authorized by license or training to act as a radiographer at Grede Foundries. In doing so the licensee was in violation of License Condition No. 11 which authorizes only specifically named individuals to use licensed materials.

Interview with Mr. George Rasic

As previously stated Mr. Rasic normally performs radiography in the RSO's absence. However, during the week of the RSO's vacation Mr. Rasic on his own decided to utilize Ms. Walloch. Prior to August 6, 1986, Mr. Rasic telephoned Bipin Shah, Technical Director, and told him of his intention to have her perform radiography. Mr. Shah indicated that it would be all right, but to check with her supervisor, Mr. Strong. Mr. Rasic talked to Mr. Strong and told him what he intended to do. Mr. Rasic said that he, Mr. Shah and Mr. Strong all knew that Ms. Walloch had not been listed on Wehr Steel's license. In addition, according to Mr. Rasic, Mr. Strong never questioned Mr. Rasic as to whether Ms. Walloch was on the license or if she was qualified to perform radiography. Mr. Rasic decided to utilize Ms. Walloch because as chief chemist he had other duties to perform and he had never used the recently purchased film processing unit. Also, while he was aware she was not listed on Grede's license, Mr. Rasic knew that an amendment to add her had been sent to the NRC in June 1986 (see Attachment F for report of interview, Rasic).

On August 6, 7 and 8, 1986, Mr. Rasic and Ms. Walloch went to the cell each day. He unlocked the door, performed the necessary start up procedures, observed a few exposures and left the cell allowing Ms. Walloch to continue alone. Ms. Walloch compiled information to be entered into the radiography exposure log. That information consisted of items such as isotope used, number of exposures, film type and exposure times.

Mr. Rasic completed and initialed the radiographic log although Ms. Walloch performed the work (see Attachment G for log example). By doing this the NRC and others in reviewing the log would have assumed that an authorized user (radiographer) performed the work. This is in violation with License Condition No. 16 which references letter dated March 7, 1985 and the attached revised manual. Item No. 6 of the revised manual requires that the manual be maintained, specifies what information it is to contain and states that the radiographer must complete and sign the log at the end of each work shift. Mr. Rasic stated that the reason he completed the log was that Ms. Walloch was not familiar with them.

Two violations were identified.

7. Exit Interview

An exit interview was held on October 28, 1986 with the individuals indicated in Section 2 of this report. The violations as well as the NRC policy regarding enforcement were discussed.

8. Enforcement Conference

An enforcement conference was held in the Region III Office on November 20, 1986. The licensee was represented by Messrs. B. Shah, G. Ertel and R. San Felipe. The NRC was represented by Mr. Jack Hind and other Region III staff. The NRC enforcement policy and proposed violations were discussed. In addressing the violations, the licensee acknowledged the facts as presented and discussed corrective actions to prevent recurrence.

Attachments:

- A. Memo from RSO dtd 6/4/86
- B. Licensee letter dtd 6/5/86
- C. Report of Interview - Ertel
- D. Assistant Radiographer Exam
- E. Report of Interview - San Felipe
- F. Report Of Interview - Rasic
- G. Radiography Log example

GRÉDE FOUNDRIES, INC

"IMPORTANT"

MEMO

WRITE IT ... VERBAL ORDERS "DON'T GO"

DATE 6-4-86

TO ~~JOE PHELPS~~ GARY ^{ERTEL} At 9898

A Reply is YES
Requested: NO

FROM DICK SAN FELIPE At M.S

SUBJECT AMENDING CURRENT LICENSE 48-02844-01

WE WANT TO PUT CHRISTINE M. WALLOCH BORN 5.26.61

S.S. 397-60-7315 ON OUR LICENSE AS A FULL

RADIOGRAPHER - SHE HAS TAKEN THE MAGNAFLUX
RADIATION SAFETY + CONTROL PROGRAM (7-15-85) AND

PASSED. SHE ALSO PASSED THE QUALIFICATION EXAM

RT-2-0184 RADIOGRAPHY LEVEL II. ON 1-22-86

ALL TESTS WERE TAKEN AT WEHR STEEL

Please let me know if there are any problems
you might call DONALD GRIBBONS (NRC) at 312-790-5500

We need this amendment as soon as possible

ATTACHMENT A

Amendment to add as
a Radiographers

Test on our equipment and
emergency procedures.

FORM 650871

GREDE FOUNDRIES, INC

WRITE IT ... VERBAL ORDERS "DON'T GO"

MEMO

DATE _____

TO _____ At _____

FROM _____ At _____

A Reply is YES
Requested: NO

SUBJECT ADDRESS

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

ATT. J. R. MADERA
MATERIALS LICENSING SECTION, REGION III