



Campbell/Harris
SECURITY EQUIPMENT COMPANY

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10 October 2022

Lizette Roldán-Otero, PhD,
Chief Materials Inspection Branch Division of Radiological Safety and Security
USNRC
1600 Lamar Blvd.
Arlington, TX 76011

SUBJECT: NRC INSPECTION REPORT 030-38916/2022-001; AND NOTICE OF VIOLATION

REFERENCE: License No. 04-35303-01E Docket No. 030-38916

Dear Lizette:

This letter is in response to your letter containing the subject notice regarding an unannounced routine inspection conducted May 10, 2022, at my facility in Alameda, California. During the NRC inspection, two violations of NRC requirements were identified. This letter addresses violations and their corrective action.

A. 10 CFR 32.32(c) requires, in part, that the licensee maintain records of all transfers and file a report with the Director of the Office of Nuclear Materials Safety and Safeguards, covering the preceding calendar year, on or before January 31 of each year. Contrary to the above, between February 1, 2020 – May 19, 2022, the licensee failed to file reports with the Office of Nuclear Materials Safety and Safeguards. Specifically, as of the date of the inspection, the licensee had not submitted reports for calendar years 2019 – 2021, these reports were then filed on May 19, 2022. *This is a Severity Level IV violation (NRC Enforcement Policy, Section 6.9.d).*

Response: As a result of the COVID-19 shutdown, our offices were closed during the period that the 2019 and 2020 reports would have normally been mailed out. Upon reopening in 2021 the fact that the reports had not been submitted was overlooked, although the records of all transfers had been maintained as required. This was partially due to the change in Radiation Safety Officer that occurred immediately prior to the shutdown. As was noted in your report full compliance was achieved when all of the missing reports were submitted on May 19, 2022. With regard to “corrective action” to ensure the annual reports are submitted in a timely manner going forward, I have personally assumed that responsibility as I am now the Radiation Safety Officer for the Company. I now have a “tickler file” to remind me of required submittals. As a small business with only six employees, I’m sure this will be sufficient for our needs.

B. License Condition 14 of NRC License No. 04-35303-01E, Amendment No. 0, dated August 31, 2016, requires, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed in License Condition 14. License Condition 14A, Application dated March 31, 2016, provides a copy of the licensee's leak test procedure, "Leak Testing K9 Series Busters". "Leak Testing K9 Series Busters" procedure states, in part, that the licensee will ship leak-test kits to the test house and when results come back, any unit(s) that exceed 185 becquerel (0.005 microcuries) must be pulled from production and quarantined. Contrary to the above, between August 16, 2016 – May 10, 2022, the licensee did not conduct its program in accordance with the "Leak Testing K9 Series Busters" procedure. Specifically, the licensee was analyzing the results of the leak-test kits in-house and failed to demonstrate that the leak test methodology utilized could detect the presence of 185 becquerel (0.005 microcuries) of radioactive material on the test sample. *This is a Severity Level IV violation (NRC Enforcement Policy, Section 6.3.d.3).*

Response: I have researched our records and I now know why there is a discrepancy between the leak test plan you have referenced and our actual past practice. After speaking with our last Radiation Safety Officer Doug Broadwell (who authored the leak test procedure) he recalls having submitted a second response to the "request for additional information" from the folks at NRC. In the second response the bullet point indicating the swab samples would be sent to an outside house for verification was removed. He felt this was appropriate because our California licenses under which we manufactured and distributed the Buster K910B Density Meters did not require a leak test, nor did it require sending test results out for confirmation. The threshold of a 300 count on the CAPRAC well counter that we use for in-house leak testing on all density meters produced under the NRC license, was chosen to represent a significant statistical certainty that there is no possibility of nuclide leakage. This setting is well within the acceptable trigger level ranges recommended by the manufacturer. The intent of our submitted plan was that should the threshold be reached, we would then send the swab out for analysis. Since the nuclide located in the trigger housing of our density meter is a "sealed source" sintered into a ceramic and contained inside a welded stainless-steel capsule, we believed that procedure to be sufficient. *It should be noted that this process has not been contested in prior audits by the NRC.* With regard to "corrective action", all density meters continue to be leak tested in house, and full compliance was achieved beginning August 10, 2022 when all test samples are now submitted to an independent outside test house for verification. The test house being used is **Radiation Solutions**, 229 Sugar Avenue, Sugar City, ID 83448. Each density meter is now issued a "Certificate of Leak Test" by the test house. The total removable amount of activity has been analyzed to be 0 microcuries on 100% of the items that have been tested by the independent test house. This gives us great confidence that our processes and procedures continue to produce safe and reliable products.

Please let me know if you have any questions, comments, or feedback.

Sincerely,

A Harris

Tony Harris, President