

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

St. Louis Testing Laboratories
St. Louis, MO

2. NRC/REGIONAL OFFICE

U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Lisle, Illinois 60532-4352

REPORT

2006-001 / 2006-002

3. DOCKET NUMBER(S)

030- 05064

4. LICENSEE NUMBER(S)

24-00188-02

5. DATE(S) OF INSPECTION

7/17-19/06

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- ☐ 1. Based on the inspection findings, no violations were identified.
- ☐ 2. Previous violation(s) closed.
- ☐ 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

- ☒ 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

(Violations and Corrective Actions)

10 CFR 34.29: Licensee Failed to conduct QI, physical inventories on 34 devices containing Depleted Uranium since 1989.

Corrective Actions: Licensee will conduct QI, physical inventories of said material from now on

10 CFR 20.1904: Licensee Failed to ensure 13 containers containing Depleted uranium were labeled as required since 1989.

Corrective Actions: Licensee has labeled said material prior to end of inspection.

Licensee's Statement of Corrective Actions for Item 4, above.

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE	Robin E. Sinn	<i>[Signature]</i>	7-19-06
NRC INSPECTOR	Michael McLaFranzo	<i>[Signature]</i>	7/19/06

Docket File Information
SAFETY INSPECTION REPORT
AND COMPLIANCE INSPECTION

1. LICENSEE St. Louis Testing Laboratories, Inc.		2. NRC/REGIONAL OFFICE Region III 2443 Warrenville Road Lisle, IL 60532	
REPORT NUMBER(S) 2006-001/002			
3. DOCKET NUMBER(S) 030-05064	4. LICENSE NUMBER(S) 24-00188-02	5. DATE(S) OF INSPECTION 7/17-19/06	
6. INSPECTION PROCEDURES USED 87121	7. INSPECTION FOCUS AREAS 03.01-3.07		
SUPPLEMENTAL INSPECTION INFORMATION			
1. PROGRAM CODE(S) 3320	2. PRIORITY C1	3. LICENSEE CONTACT Don Baumer - RSO	4. TELEPHONE NUMBER 314-531-8080
<input checked="" type="checkbox"/> Main Office Inspection <input type="checkbox"/> Field Office		Next Inspection Date: <u>7/07</u>	
<input checked="" type="checkbox"/> Temporary Job Site <u>Galleria Mall; St. Louis, MO</u>			

PROGRAM SCOPE

The licensee operates an industrial radiograph program which has authorization for a permanent facility and temporary job sites with NRC jurisdiction. The main facility was inspected as well as a temporary job site at the Galleria Mall in St. Louis, Missouri. The licensee had 15 radiographer and several assistant radiographers. The licensee had six 660B camera's authorized which contained Ir-192 and two camera's which contained Co-60. The licensee did conduct source changes on site.

During the inspection, the inspector interviewed the authorized users, licensee's management, and radiation safety officer and found that they were knowledgeable regarding their responsibilities under the license. The licensee's staff demonstrated a typical radiographic exposure utilizing an Amersham 660B exposure device containing a nominal 72 curies of Ir-192 at a temporary job site at the Galleria Mall; St. Louis, Missouri. The inspector also observed licensed activities using the permanent radiographic cell. The inspector conducted side-by-side comparison radiation surveys between NRC and licensee radiation detection equipment; the inspector did not identify any significant variation between the two instruments. The inspector reviewed the licensee's dosimetry records and determined that no exposures exceeded NRC's limits. The inspector determined that shipping papers were completed and being used in accordance with NRC/DOT requirements. The inspector determined that the licensee was performing the appropriate audits of its radiographers and radiation safety program as required.

During the inspection, two violations of NRC requirements were identified. The violations were associated with 34 exposure devices that contained Depleted Uranium (DU) which the licensee did not realize they possessed since at least 1989. Specifically in the 1980's, the licensee was authorized to manufacture its own radiographic camera's. To that end, the licensee purchased DU shields and manufactured the casings around the DU. In the late 1980's, the licensee decided not to perform those activities anymore but did not dispose of the 34 DU sources. Of the 34 DU sources, 13 were not appropriately labeled in accordance with 10 CFR 20.1904. In all cases, the licensee did not realize they possessed the material and, therefore, did not perform quarterly physical inventories as required by 10 CFR 34.29. The citations and the licensee's corrective actions are documented on the NRC Form 591M Part 1.