

APPENDIX E

NOTE: All areas indicated in field notes are not required to be addressed during each inspection

INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION FIELD NOTES

Region L

Inspection Report No. 95-001

License No. 29-02477-01

Licensee (Name & Address):
US Testing Co., Inc.
1415 Park Avenue
Hoboken, NJ 07030

Docket No. 030-33619

Licensee Contact Lee Fredericks

Telephone No. (201) 792-2400

Last Amendment No. new

Date of Amendment 9/20/94

Priority: 7
Program Code 03123

Date of Last Inspection none
Date of This Inspection 1/23/95

Type of Inspection: ☐ Announced ☒ Unannounced
☒ Routine ☐ Special
☒ Initial ☐ Reinspection

Next Inspection Date 1/02 ☒ Normal ☐ Reduced ☐ Extended

Summary of Findings and Action:

- ☐ No violations cited, Clear 591 issued
- ☒ Violation(s), 591 issued
- ☐ Violation(s), Regional letter issued
- ☐ Followup on Previous Violations

Were non-cited violations identified during this inspection? ☐ Y ☒ N

Was proprietary information reviewed by or received by the inspector? ☐ Y ☒ N

Inspector: [Signature]
(Signature)

Date 1/23/95

Approved: [Signature]

Date 1-30-95

Issue Date: XX/XX/XX
(RI rec'd 03/10/94)

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(Signature)

1. INSPECTION HISTORY

☒ N/A - Initial inspection

- A. Violations were identified during any of the last two inspections or two years, whichever is longer () Y () N
B. Response letter(s) or 591(s) dated _____
C. Open violations from previous inspections:

Requirement Violation Corrective Action Taken (Y/N) Status Open/Closed

D. Explain any previous violation(s) not corrected or repeated () N/A

- * + Lee Fredericks (CEO + Mgr of Human Resources)
* + Tim Kroder (Supervisor of GEs)
* Kenneth Elkin (President)
* + Daniel Drozdowski (VP)
+ Jim Tyminski } GE users
+ Nasser Hanna }
+ Fred Tauber (keys to storage room - MAINTENANCE)

2. ORGANIZATION AND SCOPE OF PROGRAM

A. Organizational Structure

Lee Fredericks (CEO) ^{reports to} President: Kenneth Elkin
Mgr of Human Resources
Tim Kroder (Lab Mgr who acts as ARSO) reports to Daniel D. (VP)
+ Individuals contacted during inspection
+ Individuals present at exit meeting

1. Meets license requirements [L/C] (X) Y () N
2. Multiple authorized locations of use and/or laboratories () Y (X) N*
If yes, may use ATTACHMENT A as a guide for location(s) or lab(s) inspected and note lab numbers where violations are found. () N/A
3. Briefly describe scope of activities, including types and quantities of use involving byproduct material, frequency of use, staff size, etc.

* Only RAM at 1415 Park Ave Hoboken NJ. 2/3 users of GE
No RAM at Jim Thorpe, PA. 98 cu ft of GE in storage 2 techs
No RAM at temp job sites. 4 Portable Gages in storage. 1 supervisor
5 ECDs (3 GCs) in use. 5 ECDs in storage. Some GEs are generally licensed.
2 unknown pieces of equipment in storage room.
B. Radiation Safety Committee required [L/C] () Y (X) N

Remarks:

Licensee unaware of new Pt 20. Audit may have been performed by previous compliance officer, but record could not be found.

4. INTERNAL AUDITS, REVIEWS OR INSPECTIONS

- A. Audits are required [L/C] 20.1101(c) ☒ Y ☐ N
B. Audits or inspections are conducted ☐ Y ☒ N

- (1) Audits conducted by _____
(2) Frequency _____

- C. Content and implementation of the radiation protection program reviewed annually by the licensee [20.1101(c)] ☐ Y ☒ N
D. Records maintained [20.2102] ☐ Y ☐ N

5. FACILITIES

- A. Facilities as described in license application [L/C] ☒ Y ☐ N
B. Describe any Self-contained dry-source-storage irradiators [Part 36] and/or survey instrument calibrators (model, radionuclide, activity, use, etc.) ☒ N/A

1. Maintenance of safety-related components performed by authorized persons [L/C] ☐ Y ☐ N
2. Access to keys and/or material controlled [20.1801, 1802, L/C] ☐ Y ☐ N
3. Access to high/very high radiation areas controlled [20.1601, 1602, L/C] ☐ Y ☐ N
4. Adequate protection of shield integrity, fire protection [L/C] ☐ Y ☐ N

Remarks:

6. MATERIALS

- A. Isotope, chemical form, quantity and use as authorized [L/C] ☒ Y ☐ N
B. Licensed materials secured to prevent unauthorized removal or access [20.1801, 1802] ☒ Y ☐ N
C. Leak tests and Inventories [L/C]

1. Performed as required ☐ Y ☒ N ☐ N/A
2. Adequate analysis methodology and sensitivity ☒ Y ☐ N ☐ N/A
3. Records maintained [L/C] ☒ Y ☐ N

Storage room posted w/ CREAM sign. Door is locked. Key is kept w/ maintenance person. Door is also alarmed. Two unknown micros SH equipment are stored here along w/ 4 gauges. Licensee

*+playing
A rep. from 565 will be responsible for the safe transport of
committed to perform physical inventory &
transfer devices to sister company, 565.*

VIOLATION

Remarks:

1. Licensee has not performed physical inventory of sealed sources (ECDS + portable gauges).
2. Leak tests done on 8/3/94, 7/27/93 + 12/10/92 for GCs. 6 month frequency required.

7. RADIATION SURVEYS

N/A

only active work is N⁶³ in ECDS. Everything else in storage.

A. Instruments and equipment:

no instruments available

1. Appropriate operable survey instrumentation possessed and readily accessible [L/C] () Y () N
2. Calibrated as required [20.1501, L/C] () Y () N
3. Calibration records maintained [20.2103(a)] () Y () N

B. Briefly describe area survey requirements [20.1501(a), L/C]:

C. Performed as required [20.1501(a), L/C] () Y () N

1. Contamination found () Y () N
2. Corrective action taken and documented () Y () N

D. Records maintained [20.2103, L/C] () Y () N

E. Protection of members of the public

1. Licensee made adequate surveys to demonstrate either (1) that the TEDE to the individual likely to receive the highest dose does not exceed 100 mrem in a year, or (2) that if an individual were continuously present in an unrestricted area, the external dose would not exceed 2 mrem in any hour and 50 mrem in a year [20.1301(a)(1), 1302(b)] () Y () N
2. Unrestricted area radiation levels do not exceed 2 mrem in any one hour [20.1301(a)(2)] () Y () N
3. Records maintained [20.2103, 2107] () Y () N

Remarks:

8. RADIOACTIVE WASTE

~~(X)~~ N/A

A. Disposal

() N/A

Note: The licensee's waste is likely to be Class A.

- a. Not packaged for disposal in cardboard or fiberboard boxes [61.56(a)] () Y () N
- b. Liquid wastes solidified, i.e., less than 1% freestanding liquid, and void spaces minimized [61.56(a), (b)] () Y () N
- c. Does not generate harmful vapors [61.56] () Y () N
- d. Structurally stable (will maintain its physical dimensions and form under expected disposal conditions) [61.56(b)] () Y () N
- e. Packages properly labeled [App. F.III.A.2] () Y () N
- f. Licensee conducts a QC program to ensure compliance with [61.55, 56] and includes management evaluation of audits [App. F.III.A.3] () Y () N
- g. Shipments not acknowledged within 20 days after transfer are investigated and reported [App. F.III.A.8] () Y () N () N/A

4. Transfers to land disposal facilities () N/A

- a. Transferred to person specifically licensed to receive waste [30.41, 20.2001(b)] () Y () N
- b. Each shipment accompanied by a manifest prepared as specified in Section I of Appendix F [20.2006(b), App. F.III.A.4] () Y () N
- c. Manifests certified as specified in Section II of Appendix F [20.2006(c)] () Y () N

D. Records of surveys and material accountability are maintained [20.2103, 2108] () Y () N

Remarks: *Licensee has 98 uCi of C¹⁴ awaiting transfer to authorized recipient. Licensee has 4 portable nuclear gauges in storage and they are awaiting to transfer these devices to a sister company (S&S). Licensee has not disposed of RAY. All RAY is in storage or in use.*

9. RECEIPT AND TRANSFER OF RADIOACTIVE MATERIAL

A. Describe how packages are received and by whom: ~~()~~ N/A

- B. Written package opening procedures established and followed [20.1906(e)] () Y () N
- C. All incoming packages with DOT labels wiped, unless exempted (gases and special form) [20.1906(b)(1)] () Y () N
- D. Incoming packages surveyed per [20.1906(b)(2)] () Y () N
- E. Monitoring in (c) and (d) performed within time

14. POSTING AND LABELING

- A. NRC-3 "Notice to Workers" is posted [19.11] ☒ Y ☐ N
- B. Parts 19, 20, 21, Section 206 of Energy Reorganization Act, procedures adopted pursuant to Part 21, and license documents are posted or a notice indicating where documents can be examined is posted [19.11, 21.6] ☒ Y ☐ N
- C. Other posting and labeling per [20.1902, 1904] and the licensee is not exempted by [20.1903, 1905] ☒ Y ☐ N

Remarks:

15. RECORDKEEPING FOR DECOMMISSIONING

☒ N/A

- A. Records of information important to the safe and effective decommissioning of the facility maintained in an independent and identifiable location until license termination [30.35(g)] ☐ Y ☐ N
- B. Records include all information outlined in [30.35(g)] ☐ Y ☐ N

Remarks: *Discussed w/ licensee termination of license procedures.*

16. BULLETINS AND INFORMATION NOTICES

- A. Bulletins, Information Notices, NMSS Newsletters, etc., received by the Licensee ☒ Y ☐ N
- B. Licensee took appropriate action in response to Bulletins, Generic Letters, etc. ☒ Y ☐ N

Remarks:

17. SPECIAL LICENSE CONDITIONS OR ISSUES

☐ N/A

- A. Special license conditions or issues to be reviewed:
LC 20: Portable gauges must be locked. All gauges in their unlocked box with no pad lock on device.
- B. Evaluation: VIOLATION

18. CONTINUATION OF REPORT ITEMS

☐ N/A

19. VIOLATIONS, NCVs, AND OTHER ISSUES

() N/A

Note: Briefly state (1) the requirement and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited.

1. Physical inventories not performed. (C15) (LC14)
2. Leak tests done on annual basis - 6 month freq. required.
3. No annual review of rad. prot. program (20.1101C)
4. Each portable nuclear gauge not locked (LC20)

20. PERFORMANCE EVALUATION FACTORS

Licensee (name & location)

US Testing
1415 Park Ave
Hoboken NJ 07030

Inspector

DOLCE

Inspection Date

1/23/95

- | | |
|--|---------------------|
| A. Lack of senior management involvement with the radiation safety program and/or Radiation Safety Officer (RSO) oversight | () Y () N |
| B. RSO too busy with other assignments | () Y () N |
| C. Insufficient staffing | () Y () N |
| D. Radiation Safety Committee fails to meet or functions inadequately | () Y () N () N/A |
| E. Inadequate consulting services or inadequate audits | () Y () N () N/A |

Remarks (consider above assessment and/or other pertinent PEFs):

Licensee will review license & decide if a General license is more appropriate. Licensee's only RSO is the N163 in the ECD/SC. Licensee has generally licensed GCS in their possession.

Regional follow-up on above PEFs citations:

DIRECTIONS TO U.S. Testing ^{END} 1415 Park Ave Hoboken NJ
309 N → 78 E → At 1 + 9 N → ~~Left~~ Follow signs for Hoboken.
Make a Left on Jersey Ave (Exxon on ^{right} corner). Go under railroad overpass. Road ~~ends~~ ^{bends} to the right. Make a Left on Washington. Go to end. This is a "T" intersection. Make a Left on 14th St.

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Issue Date: XX/XX/XX
(RI rec'd 03/10/94)

At 2nd light make a right on Park Ave.
US Testing is the 2nd bldg on right. Parking lot after bldg on right.

From: Kathleen A. Dolce (KAD1)
To: WJP
Date: Tuesday, January 24, 1995 1:11 pm
Subject: US Testing Inspection

Walt,

I inspected US Testing's license (Nickel-63 ECDs in GCs). I issued a 591 and cited failure to perform physical inventories of sealed sources (LC15), and other Severity Level IV and V. The reason I am writing to you is because the licensee has in storage portable nuclear gauges and 2 UNITRONs. The devices are in a locked room and are partially labelled and need to be re-packaged prior to shipment to SGS, a sister company. The RSO and others at US Testing do not have the expertise to deal with these types of devices. This was communicated to the company's president, Kenneth Elkin, during the exit meeting. Mr. Elkin has requested the RSO write to SGS and get their people to resolve it ASAP.

I believe if the licensee performs their physical inventory, transfers these devices to authorized recipients and correct the other violations, the licensee will be in compliance again. There are no safety concerns. They are compliance issues.

Due to the history of the licensee's performance, I thought it would be appropriate to keep you informed.

Kathy

CC: MMS1