

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

INDUSTRIAL/ACADEMIC INSPECTION FIELD NOTES  
REGION II

Inspection Report No. 93-01 License No. 44-25235-02  
Docket No. 030-33035  
Licensee (Name & Address):  
United States Testing Co. Inc.  
Memphis, TN  
Licensee Contact Randall Sweet <sub>RSD</sub> Telephone No. (901) 753-7576  
Last Amendment No. NA Date of Amendment NA Priority 4  
Program Code \_\_\_\_\_ Date of Last Inspection Initial RII

Date of Inspection: 9/9/93

Type of Inspection: ☐ Announced ☒ Initial ☐ Routine  
☒ Unannounced ☐ Reactive ☐ Special  
☐ Closeout

Summary of Findings and Action:

- ☐ No violation cited, Clear 591 issued
- ☒ Violation(s), 591 issued
- ☐ Violation(s), Regional letter issued<sup>1</sup>
- ☐ Violations(s), Escalated Enforcement<sup>1</sup>
- ☐ Other Regional Action
- ☐ Headquarter Action
- ☐ Followup on Previous violations

Were non-cited violations identified during this inspection.  
☒ No ☐ Yes<sup>2</sup>

<sup>1</sup>Documentation of violations in field notes must include, requirement violated, how it was violated, who violated requirement and when it was violated.

<sup>2</sup>Documentation for non-cited violations (NCV) must include the information included in note 1 above, as well as why the violation is not being cited (licensee identified SL IV or V violations or inspector identified SL-V violations) and corrective action taken or planned by the licensee.

Overall Assessment of Licensee Performance

With the exception of GC's this licensee is  
now inactive. RSO fully aware of  
current LC's. Should be on or "performance"

Date of Next Inspection

5/97

Change to Normal Inspection Frequency:



None



Reduce Frequency



Increase Frequency

Explanation for change in Frequency:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inspector

Lee Franklin  
(Signature)

9/9/93  
(Date)

Inspector

(Signature)

(Date)

Approved

Rouger M. C. C.  
(Section Chief Signature)

10/15/93  
(Date)

1. ORGANIZATION

a. Briefly describe the organizational structure:

*See Corp. Chart in Lic. file - no change at this time*

b. Organizational structure meets license requirements. [L/C] ☒ Y ☐ N

Remarks.

c. Licensee is required to have a Radiation Safety Committee ☐ Y ☒ N

(1) If so, does RSC fulfill license requirements [L/C] ☐ Y ☐ N

(2) Records maintained ☐ Y ☐ N

Remarks.

d. Radiation Safety Officer

(1) Authorized on license [L/C] ☒ Y ☐ N

(2) Fulfills duties as RSO ☒ Y ☐ N

Remarks.

2. INSPECTION HISTORY

☒ N/A - Initial inspection

a. Last inspection conducted on \_\_\_\_\_

b. Violations or deviations were identified ☐ Y ☐ N

c. Response letter or 591 dated \_\_\_\_\_

d. Violations from Previous Inspection

<u>Requirement</u>	<u>Violation</u>	<u>Corrective Action Taken (Y/N)</u>	<u>Status</u>
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e. Any previous violations not corrected

Explain.

*NA* ( ) Y ( ) N

3. SCOPE OF PROGRAM

a. License has multiple authorized locations of use ( ☒ ) Y ( ) N

b. If so, list location(s) inspected ( ) N/A

*Inspection at Corp. RSO in Memphis, TN. Place of use now or within a few days will be at Hoboken, NJ only. Jim Thorpe, Pa office in process of being closed.*

c. List those individuals contacted during inspection

*Randall Sweet, Corp. RSO*

*Wayne Lemmey, Asst. to Corp. RSO*

\*Indicates presence at exit meeting

d. Briefly describe scope, including types of use involving byproduct material, frequency of use, staff size, etc.

*Four remaining moisture density gauges are being stored at Hoboken and will be sold if possible.*

*5 10 Mei N<sup>63</sup> sensors (GC'S) in stg. at Hoboken*

*10 GC'S in use at Hoboken (all 10 Mei N<sup>63</sup>)*

4. INTERNAL AUDITS OR INSPECTIONS

a. Audits are required by license condition ( ) Y ( ) N

b. Audits or inspections are conducted ( ) Y ( ) N

(1) Audits conducted by \_\_\_\_\_  
(2) Frequency \_\_\_\_\_

c. Records maintained. ( ) Y ( ) N

Remarks.

5. TRAINING, RETRAINING, AND INSTRUCTIONS TO WORKERS

a. Instructions to workers per [10 CFR 19.12]

☒ Y ( ) N

Remarks.

b. Training program required [L/C]

☒ Y ( ) N

(1) If so, briefly describe training program:

*Std. mfg. training requirements plus most recent  
steel school. In addition 3 wks. recert. — Recert OK.*

- (2) Training program implemented
- (3) Retraining program required
- (4) Retraining program implemented
- (5) Records maintained

( ) Y ( ) N  
( ) Y ( ) N  
( ) Y ( ) N  
( ) Y ( ) N

Remarks.

*Most recent — licensee committed to annual  
retraining of gauge operators. Could substitute  
with audit. Not performed. 591 UIC*

6. FACILITIES AND EQUIPMENT

a. Facilities as described in license application  
[L/C]

☒ Y ( ) N

Remarks.

*@ Memphis*

b. Areas for storage and use of RAM

(1) Adequate method used to prevent an unauthorized  
individual from entering restricted area

( ) Y ( ) N

(2) RAM is secured to prevent unauthorized  
removal from an unrestricted area [20.207]

( ) Y ( ) N

*} Not  
inspected*

Remarks.

c. Survey instruments

☒ N/A

(1) Appropriate operable survey instruments  
possessed

( ) Y ( ) N

(2) Calibration performed as required

( ) Y ( ) N

(3) Records maintained

( ) Y ( ) N

Remarks.

7. RADIOLOGICAL PROTECTION PROCEDURES

- a. Radioactive materials used in accordance with current procedures [L/C]  
b. Individuals understanding of current procedures is adequate [L/C]

(☒) Y ( ) N

- (1) in general rules for safe use of RAM  
(2) in emergency procedures

(☒) Y ( ) N  
(☒) Y ( ) N

Remarks.

8. MATERIALS

- a. Isotope, chemical form, quantity and use as authorized [L/C]

(☒) Y ( ) N

Remarks.

- b. Leak tests and Inventory

- (1) Leak tests of sealed sources performed as required [L/C]  
(2) Inventory of RAM performed as required [L/C]  
(3) Records maintained

(☒) Y ( ) N

(☒) Y ( ) N

(☒) Y ( ) N

Remarks.

9. RECEIPT AND TRANSFER OF RADIOACTIVE MATERIAL

- a. Describe how packages are received and by whom: (✓) N/A
- b. Opening procedures established and followed [20.205(d)] ( ) Y ( ) N
- c. Incoming packages wiped per [20.205(b)] ( ) Y ( ) N
- d. Incoming packages surveyed per [20.205(c)] ( ) Y ( ) N
- e. Transfer(s) performed per [30.41] ( ) Y ( ) N
- f. Records of surveys and receipt/transfer maintained per [20.401(b) and 30.51] ( ) Y ( ) N

Remarks.

10. AREA SURVEYS

( ) N/A

Briefly describe area survey requirements and licensee's implementation [L/C]:

*licensee has commitment to survey (wipe) C-14 use monthly and after each experiment. No use of matl which is in Bq. and awaiting disposal.*

11. PERSONNEL RADIATION PROTECTION - EXTERNAL

- a. Film or TLD supplier Rad. Detection Co. Frequency monthly
- b. Supplier is NVLAP - approved (✓) Y ( ) N
- c. Reports reviewed by RSO Frequency monthly
- d. NRC inspector reviewed personnel monitoring records for period 1/93 to 8/93
- e. NRC forms or equivalent
- (1) NRC-4: ( ) Y ( ) N Complete: ( ) Y ( ) N (✓) N/A
- (2) NRC-5: (✓) Y ( ) N Complete: (✓) Y ( ) N ( ) N/A
- [20.401(a)]
- f. List maximum exposures (millirem):

*30 mrem/month matl. Any close to "m"*

Remarks.

12. PERSONNEL RADIATION PROTECTION - INTERNAL

☒ N/A

- a. Potential for exposure of individuals to airborne RAM exists ☐ Y ☐ N
- b. Monitoring for airborne radioactivity conducted [20.201(b) to meet 20.103] ☐ Y ☐ N
- c. Records maintained [20.401 and L/C] ☐ Y ☐ N
- d. Briefly describe licensee's monitoring system for airborne radioactivity [L\_C]

- e. Bioassay program implemented as described in correspondence with NRC ☐ Y ☐ N

Remarks.

13. RADIOACTIVE EFFLUENT AND WASTE DISPOSAL

- a. RAM in effluents to unrestricted areas ☐ Y ☒ N
- b. Release in accordance with regulatory limits [20.106(a)] ☐ Y ☐ N

Remarks.

- c. Describe waste disposal method(s) - solid and liquid:

d. If LLW is stored because access to a burial site has been denied, answer (1), (2), and (3) below:

- (1) Adequate control of waste in storage is maintained ☐ Y ☐ N
- (2) Package is labeled and package integrity is adequately maintained ☐ Y ☐ N
- (3) Adequate records of surveys and material accountability are maintained ☐ Y ☐ N

- e. Disposal of waste in accordance with regulatory requirements [20.301] ☐ Y ☐ N
- f. Records maintained [20.401(b)] ☐ Y ☐ N

Remarks.

#### 14. NOTIFICATION AND REPORTS

- a. Licensee in compliance with [19.13] (reports to individuals) ☐ Y ☐ N ☒ N/A
- b. Licensee in compliance with [20.402] (theft or loss) ☐ Y ☐ N ☒ None
- c. Licensee in compliance with [20.403] (incidents) ☐ Y ☐ N ☒ None
- d. Licensee in compliance with [20.405] (overexposures) ☐ Y ☐ N ☒ None

Remarks.

#### 15. POSTING AND LABELING

- a. NRC-3 "Notice to Workers" is posted [19.11] ☒ Y ☐ N
- b. Parts 19, 20, and 21, and license 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 [20.203] ☒ Y ☐ N

Remarks.

*per RSO - Not full on site map*

16. ENVIRONMENTAL MONITORING PROGRAM

- a. Licensee has implemented an environmental monitoring program [L/C]  
b. Records maintained

*N/A*  
( ) Y ( ) N  
( ) Y ( ) N

Remarks.

- c. Briefly describe the licensee's environmental monitoring program:

17. TRANSPORTATION (10 CFR 71.5(a) and 49 CFR 171-189)

- a. Licensee makes shipments of RAM

(☒) Y ( ) N

- b. Shipments are:

- ( ) delivered to common carriers  
(☒) transported in licensee's own private vehicle  
(☒) both  
( ) no shipments since last inspection

Remarks.

*Gauges are being disposed of  
and no further transportation  
regulations will be in effect for  
this licensee.*

Complete only if shipments made since last inspection:

- c. Shipments

- (1) Authorized packages used  
[173.415,416]

(☒) Y ( ) N ( ) N/A

- (2) Package type used DOT 7A

- (3) For DOT-7A packages, performance  
test record on file [173.415(a)]

(☒) Y ( ) N ( ) N/A

- |  |   |
|--|---|
| (4) For DOT-55 packages, use is approved by NRC [173.416(a)]               | ( ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A                                     |
| (5) Other Type B packages used are approved [173.416(a)]                   | ( ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A                                     |
| (6) Licensee has COCs on file with NRC [71.12(c)(1)]                       | ( <input checked="" type="checkbox"/> ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A |
| (7) Licensee has a QA program approved by NRC [71.12(b)]                   | ( ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A                                     |
| (8) For special form sources, performance test record on file [173.476(a)] | ( <input checked="" type="checkbox"/> ) Y ( ) N ( ) N/A                                     |
| (9) Packages properly labeled [172.403, 173.441]                           | ( <input checked="" type="checkbox"/> ) Y ( ) N ( ) N/A                                     |
| (10) Packages properly marked [173.200]                                    | ( <input checked="" type="checkbox"/> ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A |
| (11) Proper shipping papers prepared and used [172.200-204]                | ( ) Y ( <input checked="" type="checkbox"/> ) N ( ) N/A                                     |
| (12) Shipping papers readily accessible during transport [177.817(e)]      | ( <input checked="" type="checkbox"/> ) Y ( ) N ( ) N/A                                     |
| (13) Vehicles placarded as necessary [172.500, 504]                        | ( ) Y ( ) N ( <input checked="" type="checkbox"/> ) N/A                                     |
| (14) Cargo blocked and braced [177.842(d)]                                 | ( <input checked="" type="checkbox"/> ) Y ( ) N ( ) N/A                                     |
| (15) Any incidents reported to DOT [171.15-16]                             | ( ) Y ( ) N ( <input checked="" type="checkbox"/> ) None                                    |

Remarks.

18. 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)] | ( <input checked="" type="checkbox"/> ) Y ( ) N |
| b. Records include all information outlined in [30.35(g)]   | ( <input checked="" type="checkbox"/> ) Y ( ) N |

Remarks.

19. INDEPENDENT MEASUREMENTS

- a. Survey instrument used \_\_\_\_\_
- b. NRC Serial No. \_\_\_\_\_
- c. Last date of calibration \_\_\_\_\_
- d. Inspector's measurements were compared to  
licensee's ( ) Y ( ) N
- e. Describe the type and results of measurements:

*Not performed*

20. BULLETINS AND INFORMATION NOTICES

a. List of Bulletins, Information Notices, etc. applicable to Licensee that have been issued since last inspection:

b. Bulletins, Information Notices, etc.,  
received by the Licensee

☒ Y ( ) N

c. Licensee took appropriate action in  
response to Bulletins, INs, etc.

☒ Y ( ) N

Remarks:

21. STORAGE OF LOW-LEVEL RADIOACTIVE WASTE BECAUSE ACCESS TO BURIAL SITE HAS BEEN DENIED (SEE Temporary Instruction 2800/20)

NOTE: Currently applies to licensees in Puerto Rico

a. If LLW is stored because access to a burial site has been denied, answer (1), (2), and (3) below:

(1) Adequate controls of waste in  
storage is maintained

( ) Y ( ) N

(2) Package is labeled and package  
integrity is adequately maintained

( ) Y ( ) N

(3) Adequate records of surveys and  
material accountability are  
maintained

( ) Y ( ) N

Remarks.

b. Issues Discussed (Violations, Non-cited Violations, other issues).

Discussed overall inspection  
and two cited violations. It was agreed  
that there is now a moot point as all  
gauges are either sold or in storage  
awaiting disposal. No dissenting comments  
were made.

① Shipping papers - No Emer. phone No. and  
No RQ designation.

② No annual test of gauge operators.  
LC-26(a).

c. Was proprietary information reviewed by or received by the  
inspector? ☐ Yes ☒ No

Briefly state the requirement and how and when the licensee violated the requirement. For non-cited  
violations indicate why the violation was not cited.