

## **Craffey, Ryan**

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**From:** Schultz, Matthew <MSCHULTZ@WadeTrim.com>  
**Sent:** Friday, May 17, 2013 10:53 AM  
**To:** Craffey, Ryan  
**Cc:** Brinks, Christopher  
**Subject:** FW: 2013 Audit  
**Attachments:** 20130517114125136.pdf

Ryan,

Please find our Audit for 2013 attached. This will be performed yearly from now on.

Thanks again for all your help, if you have any questions please feel free to contact me,

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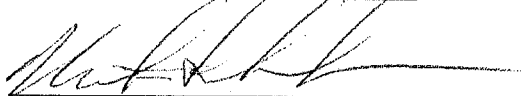
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APPENDIX F

*Note:* All areas indicated in audit notes may not be applicable to every license and may not need to be addressed during each audit.

Licensee's name: WADE TRIM, INC License No. 21-18598-02  
Auditor: MATTHEW SANCHEZ Date of Audit 5/10/13 Telephone No. 989-233-3494



(Signature)

1. AUDIT HISTORY

- Last audit of this location conducted on (date) 1/2012.
- Were previous audits conducted yearly? [10 CFR 20.1101]
- Were records of previous audits maintained? [10 CFR 20.2102]
- Were any deficiencies identified during the last two audits or two years, whichever is longer?
- Were corrective actions taken? (Look for repeated deficiencies).

2. ORGANIZATION AND SCOPE OF PROGRAM

- If the mailing address or places of use changed, was the license amended?
- If ownership changed or bankruptcy was filed, was prior NRC consent obtained or was NRC notified?
- If the RSO was changed, was the license amended? Does the new RSO meet NRC training requirements?
- If the designated contact person for NRC changed, was NRC notified?
- Does the license authorize all of the NRC-regulated radionuclides contained in the gauges possessed? YES
- Are the gauges as they are described in the Sealed Source and Device (SSD) Registration Certificate or Sheet? Are copies of (or access to) SSD Certificates available? Does the licensee have the manufacturers' manuals for operation and maintenance? [10 CFR 32.210] YES
- Are the actual uses of gauges consistent with the authorized uses listed on the license? YES
- Is the RSO fulfilling his/her duties? YES

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### 3. TRAINING AND INSTRUCTIONS TO WORKERS

- a. Were all workers who are likely to exceed 100 mrem/yr instructed per 10 CFR 19.12? Was refresher training provided, as needed? *YES*
- b. Did each gauge operator attend an approved course before using the gauges? *YES*
- c. Are training records maintained for each gauge operator? *YES*
- d. Did interviews with operators reveal that they know the emergency procedures? *YES*
- e. Did this audit include observation of operators using the gauge in a field situation?  
Operating gauge? Performing routine cleaning and lubrication? Transporting gauge?  
Storing gauge? *YES*
- f. Did the operator demonstrate safe handling and security during transportation, use, and storage? *YES*
- g. Was HAZMAT training (required at least once every three years) provided as required? [49 CFR 172.700, 49 CFR 172.701, CFR 172.702, 49 CFR 172.703, 49 CFR 172.704] *YES*

### 4. RADIATION SURVEY INSTRUMENTS

- a. If the licensee possesses its own survey meter, does the survey meter meet NRC's criteria? *—*
- b. If the licensee does not possess a survey meter, are specific plans made to have one available? *YES, MDOT BAY CITY TSC*
- c. Is the survey meter needed for non-routine maintenance calibrated as required? [10 CFR 20.1501] *No*
- d. Are calibration records maintained? [10 CFR 20.2103(a)] *—*

### 5. GAUGE INVENTORY

- a. Is a record kept showing the receipt of each gauge? [10 CFR 30.51(a)(1)] *YES*
- b. Are all gauges received physically inventoried every 6 months? *YES*
- c. Are records of inventory results with appropriate information maintained? *YES*

### 6. PERSONNEL RADIATION PROTECTION

- a. Are ALARA considerations incorporated into the radiation protection program? [10 CFR 20.1101(b)] *YES*
- b. Is documentation kept showing that unmonitored users receive less than 10 percent of limit? *WE HAVE NO UNMONITORED USERS*
- c. Did unmonitored users' activities change during the year which could put them over 10 percent of limit? *—*
- d. If yes to c. above, was a new evaluation performed? *—*

- e. Is external dosimetry required (user receiving greater than 10 percent of limit)? Is dosimetry provided to users? *YES*
- i. Is the dosimetry supplier NVLAP-approved? [10 CFR 20.1501(c)] *YES*
  - ii. Are the dosimeters exchanged monthly for film badges and at the industry-recommended frequency for TLDs? *QUARTERLY*
  - iii. Are dosimetry reports reviewed by the RSO when they are received? *YES*
  - iv. Are the records NRC forms or equivalent? [10 CFR 20.2104(d), 10 CFR 20.2106(c)]
    - NRC-4 "Cumulative Occupational Exposure History" completed? *YES*
    - NRC-5 "Occupational Exposure Record for a Monitoring Period" completed?
  - v. If a worker declared her pregnancy, did licensee comply with 10 CFR 20.1208? Were records kept of embryo/fetus dose per 10 CFR 20.2106(e)? *YES*
- f. Are records of exposures, surveys, monitoring, and evaluations maintained? [10 CFR 102, 10 CFR 20.2103, 10 CFR 20.2106] *YES*

## 7. PUBLIC DOSE

- a. Are gauges stored in a manner to keep doses below 100 mrem in a year? [10 CFR 1301(a)(1)] *YES*
- b. Has a survey or evaluation been performed per 10 CFR 20.1501(a)? Have there been any additions or changes to the storage, security, or use of surrounding areas that would necessitate a new survey or evaluation? *NO*
- c. Do unrestricted area radiation levels exceed 2 mrem in any one hour? [10 CFR 0.1301(a)(2)] *NO*
- d. Are gauges being stored in a manner that would prevent unauthorized use or removal? [10 CFR 20.1801] *YES*
- e. Are records maintained? [10 CFR 20.2103, 10 CFR 20.2107] *YES*

## 8. OPERATING AND EMERGENCY PROCEDURES

- a. Have operating and emergency procedures been developed? *YES*
- b. Do they contain the required elements? *YES*
- c. Does each operator have a current copy of the operating and emergency procedures, including current telephone numbers? *YES*

## 9. LEAK TESTS

- a. Was each sealed source leak tested every 6 months or at other prescribed intervals? *YES*
- b. Was the leak test performed as described in correspondence with NRC and according to the license? *YES*

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c. Are records of results retained with the appropriate information included? *YES*

d. Were any sources found leaking and if yes, was NRC notified? *NO*

### 10. MAINTENANCE OF GAUGES

a. Are manufacturer's procedures followed for routine cleaning and lubrication of the gauge? *YES*

b. Does the source or source rod remain attached to the gauge during cleaning? *YES*

c. Is non-routine maintenance performed where the source or source rod is detached from the gauge? If yes, was it performed according to license requirements (e.g., extent of work, individuals performing the work, procedures, dosimetry, survey instrument, compliance with 10 CFR 20.1301 limits)? *N/A*

### 11. TRANSPORTATION

a. Were DOT-7A or other authorized packages used? [49 CFR 173.415, 49 CFR 173.416(b)] *YES*

b. Are package performance test records on file? *YES*

c. Are special form sources documented? [49 CFR 173.476(a)] *YES*

d. Did the package have 2 labels (ex. Yellow-II) with TI, Nuclide, Activity, and Hazard Class? [49 CFR 172.403, 49 CFR 173.441] *YES*

e. Was the package properly marked? [49 CFR 172.301, 49 CFR 172.304, 49 CFR 172.310, 49 CFR 172.324] *YES*

f. Was the package closed and sealed during transport? [49 CFR 173.475(f)] *YES*

g. Were shipping papers prepared and used? [49 CFR 172.200(a)] *YES*

h. Did the shipping papers contain proper entries (Shipping name, Hazard Class, Identification Number (UN Number), Total Quantity, Package Type, Nuclide, RQ, Radioactive Material, Physical and Chemical Form, Activity, category of label, TI, Shipper's Name, Certification and Signature, Emergency Response Phone Number, Cargo Aircraft Only [if applicable])? [49 CFR 172.200, 49 CFR 172.201, 49 CFR 172.202, 49 CFR 172.203, 49 CFR 172.204, 49 CFR 172.604] *YES*

i. Were the shipping papers within the driver's reach and readily accessible during transport? [49 CFR 177.817(e)] *YES*

j. Was the package secured against movement? [49 CFR 177.834] *YES*

k. Was the vehicle placarded, if needed? [49 CFR 172.504] *NO, NOT NEEDED*

l. Were overpacks, if needed, used properly? [49 CFR 173.25] *---*

m. Were any incidents reported to DOT? [49 CFR 171.15, 16] *NO, NO INCIDENTS*

### 12. AUDITOR'S INDEPENDENT SURVEY MEASUREMENTS (IF MADE)

- a. Describe the type, location, and results of measurements. Do any radiation levels exceed regulatory limits? \_\_\_\_\_

### 13. NOTIFICATION AND REPORTS

- a. Was any radioactive material lost or stolen? Were reports made? [10 CFR 20.2201, 10 CFR 30.50] *No*
- b. Did any reportable incidents occur? Were reports made? [10 CFR 20.2202, 10 CFR 30.50] *No*
- c. Did any overexposures and high radiation levels occur? Were they reported? *No*  
[10 CFR 20.2203, 10 CFR 30.50]
- d. If any events (as described in items a through c above) did occur, what was the root cause? Were the corrective actions appropriate?
- e. Is the licensee aware of the telephone number for the NRC Emergency Operations Center? [(301) 816-5100] *YES*

### 14. POSTING AND LABELING

- a. Is NRC-3 "Notice to Workers" posted? [10 CFR 19.11] *YES*
- b. Are NRC regulations and license documents posted or is a notice posted stating where these documents are located? [10 CFR 19.11, 10 CFR 21.6] *YES*
- c. Is there any other posting and labeling? [10 CFR 20.1902, 10 CFR 20.1904] \_\_\_\_\_

### 15. RECORDKEEPING FOR DECOMMISSIONING

- a. Are records kept of information important to decommissioning? [10 CFR 30.35(g)] *N/A*
- b. Do records include all information outlined? [10 CFR 30.35(g)]

### 16. BULLETINS AND INFORMATION NOTICES

- a. Are NRC bulletins, NRC Information Notices, and NMSS Newsletters, received? *YES*
- b. Is appropriate training and action taken in response? *YES*

### 17. SPECIAL LICENSE CONDITIONS OR ISSUES

- a. Did the auditor review special license conditions or other issues (e.g., non-routine maintenance)? *YES, NONE*

### 18. DEFICIENCIES IDENTIFIED IN AUDIT; CORRECTIVE ACTIONS

- a. Summarize problems and/or deficiencies identified during the audit.

*REVISED TRANSPORTATION SECTION OF RSM TO CLARIFY TWD BARRIERS REQUIREMENT*

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- b. If problems and/or deficiencies were identified in this audit, describe the corrective actions planned or taken. Are corrective actions planned or taken at ALL licensed locations (not just location audited)? *SEE ABOVE*
- c. Provide any other recommendations for improvement.

19. EVALUATION OF OTHER FACTORS

- a. Is senior licensee management appropriately involved with the radiation protection program and/or RSO oversight? *YES*
- b. Does RSO have sufficient time to perform his/her radiation safety duties? *YES*
- c. Does licensee have sufficient staff to support the radiation protection program? *YES*