

Jones, Andrea

mc16/37a 484

From: Jones, Andrea
Sent: Thursday, May 12, 2016 10:39 AM
To: Charles Bollinger; Ferkile, Andrea; Baker, Stephen
Cc: Mike Rose
Subject: RE: RE: Information request

Charles, I hope Mike is doing well. Please give him my regards. I will review this further next week.

Thanks for your time.

From: Charles Bollinger [charlesb@ir100.com]
Sent: Wednesday, May 11, 2016 5:28 PM
To: Jones, Andrea; Ferkile, Andrea; Baker, Stephen
Cc: Mike Rose
Subject: [External_Sender] RE: Information request

Hello Andrea,

Mike Rose is out on sick leave and has asked me to respond to your request. I have attached the corrective action plan sent to the DOT. We also implemented a full review of our procedures and made some revisions to ensure that this doesn't happen again. I will briefly explain the incident below and feel free to email me with any questions.

On September 04, 2015 Nordion Canada shipped cycle 15-07 consisting of two (2) bulk shipping containers s/n 63 and 68. Drum 63 contained four (4) special form capsules with a total activity of 7402ci. Drum 68 contained four (4) special form capsules with a total activity of 7846ci. When the material is received it is first logged and paperwork is matched with the technical data sheets (TDS) supplied the week prior. Then the material is placed in storage until we have room in the hot cell to load. Sometimes it takes a few weeks or longer to empty a drum depending on orders. What we have determined happened is that when the material was received and the information transferred from the TDS to our internal forms one of the special form capsules in each drum had not been recorded. The reason it went unnoticed by two people was the fact that we had been only receiving 3 special form capsules in the previous 7 or more shipments and no one would have known to look for a fourth capsule. To explain a little further our hot cell design doesn't allow for a look inside the inner cast of the bulk container. We use a tool to remove the special form capsules one at a time and check them off based on the capsule serial number. Once all the serial numbers are accounted for the cast is presumed to be empty. The lid is reattached in the hot cell and then pulled out for survey and wipe test. It was just bad luck that the first 3 special form capsules we pulled out of both drums were the exact same that were recorded on the forms. Had the technician pulled a serial number that wasn't on the paperwork he would have gone back to relook at the original TDS. Because the activity was so low in the fourth capsules the surface reading was the same as if the inner cast were empty. On October 16, 2015 INC shipped drum 63 and 68 back to Nordion Canada using Fedex (tracking 936045904056) containing special form capsule s/n 1082 with 688.53 curies in drum 63 and special form capsule s/n 1080 with 707.92 curies in drum 68. The shipment was received at location October 21, 2015.

Regards,

Charles Bollinger
Chief Operating Officer
Industrial Nuclear Company
510-352-6766 office
801-688-3291 cell



INDUSTRIAL NUCLEAR CO., INC.

January 11, 2016

Mr. Patrick Lease
U.S. department of Transportation
Pipeline & Hazardous Materials Safety Administration
Office of Hazardous Materials Safety
3401 Centrelake drive, Suite 550B
Ontario, ca 91761

Subject: Hazmat Security Inspection December 3, 2015

Dear Mr Lease,

Industrial Nuclear Company would like to furnish the following information.

Corrective Action Plan
Incident Number: 001-10-23-2015
Incident Date: 10/22/2015

Corrective Action:	<ol style="list-style-type: none">1. All paperwork with transfer of information will be doubled checked by the RSO or ARSO and then verified for accuracy by the Hot Cell Tech. The Hot Cell Tech will be required to sign the paperwork before the material is loaded into the hot cell.2. All bulk containers are going to be surveyed twice by the Hot Cell Tech before shipping. The first time after it has been removed from the Hot Cell then once it has been placed in the overpack. All inner cask will be opened to verify they are empty before they are loaded into the overpack.3. The Source Fabrication Procedure will be reviewed by Executive Safety Committee to determine if update procedures are required. This procedure covers empty bulk material container proper handling prior to shipping.4. An independent ANSI N45.2.23 certified lead auditor Mr. Ron Monteforte has been hired to review and audit related portions of the radiation safety program.
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If you have any questions or concerns please do not hesitate to contact me at the information below.

Regards,



Mike Rose

QAM/ARSO

14320 Wicks Blvd

San Leandro, CA 94577

510-352-6767 ph

510-352-6772 fax