DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MEDICAL OPERATIONS AGENCY
BROOKS AIR FORCE BASE, TEXAS

OCT 9

5 OCT 1992

FROM: HQ AFMOA/SGPR
Brooks AFB TX 78235-5000

SUBJ: Reply to Notice of Violation (NOV), License No. 42-23539-01AF, NRC Inspection Report No. 030-28641/92-03

TO: USNRC, Region IV
ATTN: Ms. Linda McLean
Parkway Central Plaza Bldg
611 Ryan Plaza Drive, Suite 400
Arlington TX 76011-4010

1. This is in response to your 3 Sep 92 letter transmitting subject NOV issued as a result of inspections of USAF Radioactive Material Permits 09-17214-01AFP, 09-50031-4AFP, 09-10079-2AFP, 09-30031-1AFP and 09-30177-1AFP at Eglin Air Force Base (AFB) and Hurlburt Field, Florida.

2. Attachment 1 transmits responses from each permittee as well as a cover letter from the Eglin AFB radiation safety officer (RSO) addressing issues associated with timeliness of leak testing, 10 CFR 21.6 posting requirements and shipment of Inflight Blade Integrity System (IBIS) sources. For reference, the attachments to the RSO's letter correspond to the paragraphs and permits given in Appendix A of the NOV as follows:

a. Attachment 1 - paragraph A (09-17214-1AFP).

b. Attachment 2 - paragraph B (09-50031-4AFP).

c. Attachment 3 - paragraph C (09-30031-1AFP).

d. Attachments 4, 5 and 6 - paragraph D (09-30177-1AFP).

e. Paragraph 5 of the Base RSO's cover letter - paragraph E, all permits.

3. The RSO's letter also states that permittee corrective actions were completed, except as otherwise noted, by Jun 92 as confirmed by permit compliance inspections conducted by the Air Force Inspection Agency (AFIA) during the period 1 - 11 Jun 92. Copies of the AFIA inspection findings for each permittee were previously provided to you (SAF/IG Ltr, 11 June 92). Where the cause for a violation is not specifically identified, it may be taken that the cause was permittee and permit RSO inattention to details of NRC requirements. We believe the need for attention to detail has been adequately reinforced with each permittee's

staff and RSO by both the NRC and subsequent Air Force inspections and the Base RSO's action to assist permittees in responding to this NOV.

4. Reference paragraph C1 of the NOV and attachment 3 to the RSOs letter (Atch 1). The permittee's alternate RSO has confirmed by telephone that the operating instruction changes were completed as of 5 Oct 92.

5. Reference paragraph D2 of the NOV. The Base RSO has provided data showing the maximum package surface exposure rate with the package combination cited (with a 500 microCurie IBIS unit) was 0.4 millirem per hour as measured with a Ludlum Model 19 micro-R meter. We have also taken Air Force wide action (Atch 2) to remind operational Commands and each permittee authorized IBIS sources of requirements for proper shipment.

6. Reference paragraph E of the NOV. We understand that 10 CFR 21 applies to all licensees and reinforced this by letter to our permittees (Atch 3). In the case of complex devices using high output sources such as teletherapy units and irradiators or production type facilities, we can see how 10 CFR 21 applies. Its practical application to the majority of our permittees who are authorized use of small sealed sources in such devices as chemical agent detectors, gas chromatographs, IBIS and D0062 and UDM-6 calibrator sets is not clear. We will remind selected permittees specifically of the posting requirement under 10 CFR 21.6 by 15 Oct 92, but solicit guidance as to the requirement for all permittees to accomplish such posting. Paragraphs 15a(12) and (13) of Air Force Regulation 161-16, Control of Radioactive Material, currently address permittee reporting of defects and noncompliances.

7. Please call me at (512) 536-3331 should you have any questions concerning this response. (NOTE: Effective 1 Nov 1992, our Commercial Telephone Area Code will change from 512 to 210.)

DAVID G. WOOD, COLONEL, USAF, BSC
Chief, USAF Radioisotope Committee Secretariat
Office of the Surgeon General

3 Atch
(See Next Page)

3 Atch
1. AFSC Reg Hosp Eglin/SGB Ltr, 24 Sep 92 w/6 Atch
2. HQ AFMOA/SGPR Ltr, 25 Sep 92
3. HQ AFOMS/SGPR Ltr, 28 Aug 91 w/o Atch

cc: USNRC Document Control Desk
HQ AFMOA/SGP
HQ AFIA/SG2R
HQ AFMC/SGB w/o Atch
AFDTC/SGB w/o Atch
AFDTC/SGHRI w/o Atch
WL/MNOE w/o Atch
3246 TW/TERL w/o Atch
20 SOS/CC w/o Atch
834 ABW/LGSCW w/o Atch
834 ABW/TRTFP w/o Atch

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE DEVELOPMENT TEST CENTER (AFMC)
EGLIN AIR FORCE BASE, FLORIDA

FROM: AFSC Regional Hospital Eglin/SGB 24 Sep 92
EGLIN AFB, FL 32543-5300

SUBJ: Reply to Notices of Violation, NRC Inspection 5-7 May 92

TO: HQ AFMOA/SGPR

1. The responses of all permit RSO or responsible individuals for all permittees cited by Notices of Violation (NOV) are attachments 1-6. Mr Vela of our Precision Measurements Equipment Laboratory and I agreed that no separate response need be forthcoming from permit 09-10079-2AFB. Only one discrepancy, to "All Permitees" is applicable to them. It is addressed on a base-wide basis in para 5. below. As this office is responsible for the base radiation protection program, the response is not complete without some clarification.

2. Leak tests were done by this office until June 1990. We accept responsibility for any leak tests that exceeded the six month interval prior to that date and concur that conditions of the permits involved were violated, specifically the January-August 1988 time interval of NOV B and the January-September 1989 time interval of NOV A. 2. Since I did not arrive here until March of 1990, we cannot ascertain any reason for this occurrence otner than oversight. Upon my arrival I instituted a number of changes to address recognized shortfalls in the program, described in part below.

3. First, the leak test requirement is coordinated but no longer performed by this office. This takes the form of semi-annual letters to the permittees instructing them to perform leak tests, listing the sources by serial number and radionuclide, and providing the laboratory sample number. In the past, the letters were disseminated in December and June for the leak tests in January and July. This technique, instituted in June of 1990, improved management of the program. It did lead, however, to a possible loophole in leak test timing in that some permittees would respond promptly (ie in December instead of January) with one of the twice yearly tests and wait until just before the suspense date on the next. This can inadvertently lead to a 5 month/7 month cycle of leak testing instead of two 6 month cycles. We concur that the 6 month interval has been exceeded once under this system. This office accepts responsibility for the portion of the violation (NOV paragraph B, interval between Jun 91 and Jan 92) caused by this system. This has been rectified in that notification for leak testing and semi-annual *in vitro* bioassay will from now on cite a specific calendar month in which the test must be performed. Annual permit review checklists will be amended to include inspection of compliance on this item.

4. This leak test coordination technique also did not pick up the statutory difference between leak test requirements for routine sealed sources in accordance with 10 CFR 20 and leak test requirements for nuclear medicine sources in accordance with 10 CFR 35. The latter requires such data items as model number and permit RSO signature, although the actual sampling technique and frequency are identical. Annual permit review checklists will be amended to differentiate inspection of nuclear medicine source documentation and inspection of other sealed source documentation.

5. The base program is at least in part responsible to insure that all applicable regulations are known and briefed to the radiological community. We were unaware, however, that 10 CFR 21.6 applied to any but reactor operations and associated equipment. This would seem to be a common misconception in the radiologic community in general, not just here at Eglin. Upon review of 10 CFR 21.6 we concur that the posting requirements of 10 CFR 21.6 were not met. In response, we have provided all permittees with the extract from title 42 of the United States Code (USC) §5846 which were provided by Mr Fitch of AFDTC/JA. The letter providing it instructed the permittees to post it next to the required NRC form 3 We will include an implementing paragraph in upcoming periodic review of the local AFDTC Regulation 161-16. Annual permit review checklists will be amended to inspect compliance.

6. We concur that we have in the past received material in packaging that did not meet the limits for UN 2911 qualification (NOV D. 2.,) but we have not shipped them the same way we received them (see Atch 6.) The packaging requirements were discussed during the decision-making process to form a second permit for Inflight Blade Inspection System (IBIS) sources in the fall of 1990. I was present at the meeting, as well as several representatives of the maintenance organization, CMSgt Lee of the supply organization, and Mr. Wine of the traffic management office (TMO), among others. At that time Mr. Wine presented the group with an extract of TM 12210-1 which clearly lays out the minimum requirements for shipping the IBIS per UN 2911. We have done it that way at least since that time. It never occurred to us to "do it the way Warner-Robins (AFB) does." All of the above is not known to the maintenance workers, who reported truthfully that such items were presented to TMO in the same boxes they came in. Further, when this issue was brought to our attention, I contacted Lt John K. Haralson, USAF Hospital Robins/SGB at Warner-Robins AFB, GA by telephone to inform him of the condition noted. Since then the items from Robins have been in compliance as well. We believe this will fix the problem Air Force wide. No further action is necessary to institute compliance. Annual permit review checklists will be amended to inspect compliance of both receipt and shipping.

7. This program was inspected for compliance during the Health Services Inspection in June, which documented that the discrepancies noted in the NRC out brief were rectified by the time of that inspection. Thus no responses of the individual permitees include information on estimated date the violation will end as all ended within days of the inspection visit. I have visited each permittee to insure that all of the required compliance correction measures have been effective.

8. Please feel free to call me with any questions at 882-5787.

M G Tiedemann

MARK G. TIEDEMANN, Capt, USAF, BSC
Center Radiation Safety Officer

6 Atch
1. AFDTC/SGHRI ltr, 23 Sep 92
2. WL/ MNOE ltr, 21 Sep 92
3. 3246 TW/TFRL ltr, 22 Sep 92
4. 20 SOS/OC ltr, 22 Sep 92
5. 834 ABW/LGSCW ltr, 21 Sep 92
6. 834 ABW/TRTFP ltr, 21 Sep 92

cc: HQ AFMC/SGBE

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE DEVELOPMENT TEST CENTER (AFMC)
EGLIN AIR FORCE BASE, FLORIDA

FROM: SGHRI

23 September 1992

SUBJ: Nuclear Regulatory Commission Inspection
AFDTC/SGHR, 5 May 92

MST 24 Sep

TO: SGB/Captain Mark Tiedemann

Responses to notice of violations (Appendix A).

A. (1) We concur with stated violation in that we did not have required calculations performed.

Response: All disposal from May 1992 onward would be by decay and storage to background

(2) Regarding sealed sources Barium 133, serial #358048A/16, Cs/137, serial #3560'62, A/25 and Cs/137 serial #3817NA, we concur that swipe tests were performed in February and September 1989 which is at a seven month interval which does exceed the agreed limits of six months. Better effort will be made in the future to follow guidelines and not let the swipe tests be performed at intervals greater than six months' time. In regard to the swipe tests between April 1991 and January 1992, we do not concur with the NRC violation. Swipe test were, in fact, performed in January 1991, April 1991, and January 1992. Results from the swipe tests are enclosed in this letter.

(3) We concur with stated violation in that record keeping was not as prescribed. Better records will be kept from this point on. At required RSC meeting, this has been added as a standard agenda item and will be reviewed regularly.

(4) We concur with stated violation in that record keeping was not as prescribed. The leak test records did not contain serial numbers of the source. The serial number was in the permit folder. The model number of the source and documentation linking the serial number to the sample number was not posted. Better recording keeping will be performed in the future and this report will be signed by the Radiation Safety Officer.

(5) We concur with the stated violation in that prescribed record keeping was not adequately maintained. From this point on, sealed sources will be identified by room number and signed by the RSO.

(6) We concur with the violation in that prescribed record keeping was not adequately maintained. From this point on, the RSO will sign all survey reports.

(7) We concur with the violation in that record keeping was not as prescribed. From this point on, by-product material placed in storage for decay will include the date placed in storage, the radionuclide disposed, the survey instrument used, and the background dose rate.

ROBERT J. CROWTHER, CAPT, USAF, MC
Radiation Safety Officer

2 Atchs
Test results

ATCH 1

DEPARTMENT OF THE AIR FORCE
AIR FORCE SYSTEMS COMMAND REGIONAL HOSPITAL EGLIN (AFSC)
EGLIN AIR FORCE BASE, FLORIDA 32542-5300

Reply to
attn of: SGPB (Capt Tiedemann, 882-5787) 11 Jun 91

Subject: Leak Test Requirements of Permit 09-17214-1AFP

To: AFSC Reg Hosp Eglin/SGHRI

1. Semi-annual leak test "swipe samples" are due for all permits. Due to problems with permit violations in the recent past, all permittees will be required to perform their own leak tests. This office maintains the master roster of all samples submitted to AL. The sample numbers for the year assigned to this permit are as follows

Isotope	source number	Sample number	
Ba-133	358048a-16	ww912001	ww912002
Cs-137	3560582a-25	ww912003	ww912004
Cs-137	3817MA	ww912005	ww912006
Co-57	2060582B-21	ww912007	ww912008
Co-57	~~7211MA~~ 3041MF	ww912009	ww912010
~~Co-57~~	~~7211MA~~	~~ww912011~~	~~ww912012~~
Co-57	s8221004	ww912013	ww912014
Co-57	4408MF	ww912015	ww912016

	Reference source		
Co-57	NES-137s-050190	ww912017	ww912018
Cs-137	NES-139s-122989	ww912019	ww912020
Ba-133	NES-138s-041690	ww912021	ww912022
Mn-54	NES-140s-032090	ww912023	ww912024
Na-22	NES-141s-052990	ww912025	ww912026
Co-60	NES-142s-010390	ww912027	ww912028
Cd-109	NES-146s-101189	ww912029	ww912030

spares(10): ww912031 through ww912040

2. Please perform the second leak test and mail to AL/OEBSD by 25 Jul 91. The AF Form 495s are attachment 1. The second of the two assigned numbers (even number) is to be used on this submission.

3. This office will continue to provide area monitoring support for all permits. We can also provide training for anyone who is unsure of procedures for this requirement. Contact me at 882-5787 if you have any questions.

Mark G Tiedemann

MARK G. TIEDEMANN, Capt, USAF, BSC
Chief, Radiation Protection Programs
Base Radiation Protection Officer

3 ATCH
1. AF Form 495s
2. TO 00-110N-3 extract
3. Filter paper

Atch 1

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE DEVELOPMENT TEST CENTER (AFMC)
EGLIN AIR FORCE BASE, FLORIDA

FROM: SGPB 10 July 1992

SUBJ: Leak Test Requirements of Permit 09-17214-1AFP

TO: SGHRI

1. Semi-annual leak test "swipe samples" are due for all permits. Due to problems with permit violations in the recent past, all permittees will be required to perform their own leak tests. This office maintains the master roster of all samples submitted to AL/OESB. The sample numbers for the year assigned to this permit are as follows:

Isotope	Source Number	Sample #	
Ba-133	358048a-165	ww922001	ww922002
Cs-137	3560582a-25	ww922003	ww922004
Cs-137	3817MA	ww922005	ww922006
Co-57	2060582B-21	ww922007	ww922008
Co-57	~~7211MA~~ 3241MF	ww922009	ww922010
~~Co-57~~	~~7211MA~~	~~ww922011~~	~~ww922012~~
Co-57	s8221004	ww922013	ww922014
Co-57	4408MF	ww922015	ww922016
	Reference Source		
Co-57	NES-137s-050190	ww922017	ww922018
Cs-137	NES-139s-122989	ww922019	ww922020
Ba-133	NES-138s-041690	ww922021	ww922022
Mn-54	NES-140s-032090	ww922023	ww922024
Na-22	NES-141s-052990	ww922025	ww922026
Co-60	NES-142s-010390	ww922027	ww922028
Cd-109	NES-146s-101189	ww922029	ww922030

spares (10): ww922031 through ww922040

240-2061 Mgr Mckown

2. Please perform the first leak test and mail to AL/OESB by 25 July 1992. The AF Forms 495 are attachment 1. The first of the two assigned numbers (odd number) is to be used on this submission.

3. Recently we have been through a no-notice NRC inspection and an HSMI inspection. It was noted that while the letters were being sent out on a 6-month cycle but with a one-month lead time on the letter the samples may be taken early on one and on time on the second, leading to a 7-month sampling interval. Please ensure that your sample is taken in the calendar month of July 1992 and annotated on the AF Form 495.

AL/OESA
Brooks AFB TX
78235-5000
Sent 20 July 92

DEPARTMENT OF THE AIR FORCE
AIR FORCE SYSTEMS COMMAND REGIONAL HOSPITAL EGLIN (AFSC)
EGLIN AIR FORCE BASE, FLORIDA 32542-5300

Reply to
attn of: SGPB (Capt Tiedemann, 882-5787) 7 Jan 91

Subject: Leak Test Requirements of Permit 09-17214-1AFP

To: AFSC Reg Hosp Eglin/SGHRI

1. Semi-annual leak test "swipe samples" are due for all permits. Due to problems with permit violations in the recent past, all permittees will be required to perform their own leak tests. This office maintains the master roster of all samples submitted to AFOEHL. The sample numbers for the year assigned to this permit are as follows

Isotope	source number	Sample number	
Ba-133	358048a-16	ww912001	ww912002
Cs-137	3560582a-25	ww912003	ww912004
Cs-137	3817MA	ww912005	ww912006
Co-57	2060582B-21	ww912007	ww912008
Co-57	~~7211MA~~ 32-111MF	ww912009	ww912010
~~Co-57~~	~~7211MA~~	~~ww912011~~	~~ww912012~~
Co-57	s8221004	ww912013	ww912014
Co-57	4408MF	ww912015	ww912016

	Reference source		
Co-57	NES-137s-050190	ww912017	ww912018
Cs-137	NES-139s-122989	ww912019	ww912020
Ba-133	NES-138s-041690	ww912021	ww912022
Mn-54	NES-140s-032090	ww912023	ww912024
Na-22	NES-141s-052990	ww912025	ww912026
Co-60	NES-142s-010390	ww912027	ww912028
Cd-109	NES-146s-101189	ww912029	ww912030

spares(10): ww912031 through ww912040

2. Please perform the first leak test and mail to AFOEHL/RZ by 25 Jan 91. The AF Form 495s are attachment 1. The first of the two assigned numbers (odd number) is to be used on this submission.

DEPARTMENT OF THE AIR FORCE
AIR FORCE SYSTEMS COMMAND REGIONAL HOSPITAL EGLIN (AFSC)
EGLIN AIR FORCE BASE, FLORIDA 32542-5300

REPLY TO ATTN OF: SGPB (Capt Tiedemann, 882-5787) 12 December 1991

SUBJECT: Leak Test Requirements of Permit 09-17214-1AFP

TO: SGHRI

1. Semi-annual leak test "swipe samples" are due for all permits. Due to problems with permit violations in the recent past, all permittees will be required to perform their own leak tests. This office maintains the master roster of all samples submitted to AFOEHL. The sample numbers for the year assigned to this permit are as follows:

Isotope	Source number	Sample number	
Ba-133	358048a-16	ww922001	ww922002
Cs-137	3560582a-25	ww922003	ww922004
Cs-137	3817MA	ww922005	ww922006
Co-57	2060582B-21	ww922007	ww922008
Co-57	~~7211MA~~ 3241m1	ww922009	ww922010
~~Co-57~~	~~7211MA~~	~~ww922011~~	~~ww922012~~
Co-57	s8221004	ww922013	ww922014
Co-57	4408MF	ww922015	ww922016

Isotope	Reference source		
Co-57	NES-137s-050190	ww922017	ww922018
Cs-137	NES-139s-122989	ww922019	ww922020
Ba-133	NES-138s-041690	ww922021	ww922022
Mn-54	NES-140s-032090	ww922023	ww922024
Na-22	NES-141s-052990	ww922025	ww922026
Co-60	NES-142s-010390	ww922027	ww922028
Cd-109	NES-146s-101189	ww922029	ww922030

spares (10): ww922031 through ww922040

2. Please perform the first leak test and mail to AL/OESB by 25 January 1992. The AF Forms 495 are attachment 1. The first of the two assigned numbers (odd number) is to be used on this submission.

3. It is also time for an annual permit review. Please call my office to schedule an appointment during the month of January. Annual training can be obtained in conjunction with this appointment. All personnel who handle

6/JAN 1992

INVENTORY of Nuclear Medicine Sources

source	serial number	Thalf (year)	"as of" date	activity (uCi)	present date	activity
Ba-133	358048a-16	10.5	04/16/82	250	01-Jul-92	127.4207
Cs-137	3560582a-25	30	05/11/82	206	01-Jul-92	162.9705
Cs-137	3817MA	30	12/01/86	250	01-Jul-92	219.7473
Co-57	2060582B-21	0.743874	05/13/82	4900	01-Jul-92	0.387762
Co-57	3241MF	0.743874	07/01/87	5000	01-Jul-92	47.28741
Co-57	s8221004	0.743874	06/28/90	5250	01-Jul-92	807.0939
Co-57	4408MF	0.743874	07/01/90	10000	01-Jul-92	1549.133
rod source	Reference source					
Co-57	NES-137s-05019	0.743874	05/01/90	0.1	01-Jul-92	0.013259
Cs-137	NES-139s-12298	30	12/29/89	0.111	01-Jul-92	0.104758
Ba-133	NES-138s-04169	10.5	04/16/90	0.107	01-Jul-92	0.092478
Mn-54	NES-140s-03209	0.854483	03/20/90	0.164	01-Jul-92	0.025729
Na-22	NES-141s-05299	2.602	05/29/90	0.112	01-Jul-92	0.064154
Co-60	NES-142s-01039	5.271	01/03/90	0.11	01-Jul-92	0.079269
Cd-109	NES-146s-10118	1.26653	10/11/89	1.34	01-Jul-92	0.302186

M G Tiedemann

MARK G. TIEDEMANN, Capt, USAF, BSC
Hospital Radiation Protection Officer

SAMPLE ANALYSIS RESULTS REPOR.ED ON 24-JAN-1992
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEBSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49200046

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WW922005
OEHL ID: 49200046
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 ____ ____ EGLIN AFB, FL
Date Collected: 06-JAN-92
Date Received: 13-JAN-92
Date Completed: 24-JAN-92

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 24-JAN-1992
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEBSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49200044

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WM922001
OEHL ID: 49200044
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 ____ ____ EGLIN AFB, FL
Date Collected: 06-JAN-92
Date Received: 13-JAN-92
Date Completed: 24-JAN-92

BARIUM 133	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 24-JAN-1992
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEBSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49200045

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WW922003
OEHL ID: 49200045
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Collected: 06-JAN-92
Date Received: 13-JAN-92
Date Completed: 24-JAN-92

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 19-JUL-1991
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEBSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49103420

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058

IDENTIFICATION:
Base Sample #: WW912006
OEHL ID: 49103420
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 ____ ____ EGLIN AFB, FL
Date Collected: 24-APR-91
Date Received: 12-JUL-91
Date Completed: 18-JUL-91

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 19-JUL-1991
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEBSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49103419

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW912004
OEHL ID: 49103419
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Collected: 24-APR-91
Date Received: 12-JUL-91
Date Completed: 18-JUL-91

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 19-JUL-1991
ARMSTRONG LABORATORY
OCCUPATIONAL AND ENVIRONMENTAL HEALTH DIRECTORATE
RADIOANALYTICAL FUNCTION (OEHSA)
BROOKS AIR FORCE BASE, TEXAS 78235-5000

OE ID

49103418

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW912002
OEHL ID: 49103418
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Collected: 24-APR-91
Date Received: 12-JUL-91
Date Completed: 18-JUL-91

BARIUM 133	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 25-JAN-1991
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

49100335

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q0006dZ

IDENTIFICATION:
Base Sample #: WW912005
OEHL ID: 49100335
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Received: 18-JAN-91
Date Completed: 24-JAN-91

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 25-JAN-1991
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

49100334

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: W312003
OEHL ID: 49100334
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Received: 18-JAN-91
Date Completed: 24-JAN-91

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON 25-JAN-1991
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

49100333

USAF RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW912001
OEHL ID: 49100333
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 ____ ____ EGLIN AFB, FL
Date Received: 18-JAN-91
Date Completed: 24-JAN-91

BARIUM 133	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

MICHAEL D. McKINNON, Maj, USAF, BSC
Health Physicist
AUTOVON 240-2061

SAMPLE ANALYSIS RESULTS REPORTED ON: 02-OCT-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48905880

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WW890701
OEHL ID: 48905880
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 EGLIN AFB, FL
Date Collected: 09-SEP-89
Date Received: 18-SEP-89
Date Completed: 29-SEP-89

BARIUM 133	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

Mark C. Wrobel, Capt, USAF, BSC
Health Physicist
AUTOVON 240-2061

Approved RSO 7/10/90

SAMPLE ANALYSIS RESULTS REPORTED ON 02-OCT-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48905877

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WW090699
OEHL ID: 48905877
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 — EGLIN AFB, FL
Date Collected: 09-SEP-89
Date Received: 18-SEP-89
Date Completed: 29-SEP-89

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

Mark C. Wrobel, Capt, USAF, BSC
Health Physicist
AUTOVON 240-2061

RSO 7 Feb 90

SAMPLE ANALYSIS RESULTS REPORTED ON 02-OCT-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48905878

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW890698
OEHL ID 48905878
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 — EGLIN AFB, FL
Date Collected: 09-SEP-89
Date Received: 18-SEP-89
Date Completed: 29-SEP-89

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

Mark C. Wrobel, Capt, USAF, BSC
Health Physicist
AUTOVON 240-2061

gblaughter R&O 7/6/90

SAMPLE ANALYSIS RESULTS REPORTED ON 24-MAR-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48900942

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW890081
OEHL ID: 48900942
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 _____ _____ EGLIN AFB, FL
Date Collected: 30-JAN-89
Date Received: 07-FEB-89
Date Completed: 23-MAR-89

BARIUM 133	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

David [illegible], Maj, USAF, BSC
Chief, Radioanalytical Branch
AUTOVON 240-2061

7 Feb 90
RSO

SAMPLE ANALYSIS RESULTS REPORTED ON 01-MAR-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48900943

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q00058Z

IDENTIFICATION:
Base Sample #: WW890082
OEHL ID: 48900943
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 _____ _____ EGLIN AFB, FL
Date Collected: 30-JAN-89
Date Received: 07-FEB-89
Date Completed: 28-FEB-89

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES
ERROR TERM AT 95% CONFIDENCE LEVEL.

David Hunter, Maj, USAF, BSC
Chief, Radioanalytical Branch
AUTOVON 240-2061

gchaughess 7 Feb 90

SAMPLE ANALYSIS RESULTS REPORTED ON 01-MAR-1989
USAF OCCUPATIONAL AND ENVIRONMENTAL HEALTH LABORATORY
BROOKS AIR FORCE BASE, TEXAS 78235-5501

OEHL ID

48900945

AFSC RGN HOSP EGLIN/SGPB
EGLIN AFB FL 32542-5300

BASE ADDRESS CODE: Q000582

IDENTIFICATION:
Base Sample #: WW890084
OEHL ID: 48900945
Type of Sample: SURFACE CONTAMINANT
Workplace or Site ID: 00058 ____ ____ EGLIN AFB, FL
Date Collected: 30-JAN-89
Date Received: 07-FEB-89
Date Completed: 28-FEB-89

CESIUM 137	< 5.0E-05	MICROCURIES PER SWIPE

RESULTS ACCURATE TO 2 SIGNIFICANT FIGURES.
ERROR TERM AT 95% CONFIDENCE LEVEL.

David Hunter, Maj, USAF, BSC
Chief, Radioanalytical Branch
AUTOVON 240-2061

7 Feb 90

DEPARTMENT OF THE AIR FORCE
WRIGHT LABORATORY (AFMC)
EGLIN AIR FORCE BASE, FLORIDA

FROM: MNOE 21 Sep 92

SUBJ Nuclear Regulatory Commission (NRC) Inspection Discrepancy for Source Material Permit 09-50031-4AFP

TO 3200 SW/SGPB (Capt Tiedeman) MS 22 Sep 92

1. Sealed source leak tests prior to June 1990 were performed by the 3200 SW/SGPB on six month intervals. Any swipe frequency discrepancies prior to that time frame were out of the control of the WL/MNOE. After June of 1990 individual permit holders were required to take their own swipes upon being notified by the 3200 SW/SGPB and receiving laboratory control numbers for shipping samples to Armstrong Laboratory. During June 1991 to January 1992 interval, sealed source leak test on a new piece of analytical equipment (Portable X-Ray Fluorescence) had gotten behind schedule due in part to the equipment being shipped back to the manufacturer for repair of the detector. The equipment was swiped and analyzed upon receipt from the manufacturer (3 April 1991) and again on return of the equipment after repair (15 April 1991). In addition, the manufacturer performed swipe analysis prior to shipping the equipment back to Eglin Air Force Base. Since the equipment was new and had been swiped as late as 15 April 1991, it was the understanding of this office the equipment would be picked up on the January 1992 interval instead of June 1991 interval. The equipment is currently back on a regular six month cycle and swipe results in the permittees folder are now up to date. To further resolve this problem, the Base RSO is submitting letters along with swipe containers to each permittee in advance of the required due date for analysis by the Armstrong Laboratory.

2. If you have further questions please call me at 882-4446, extension 2441.

Richard C. Crews
RICHARD C. CREWS
Permit RSO
Permit No. 09-50031-4AFP

ATCH 2

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE DEVELOPMENT TEST CENTER (AFMC)
EGLIN AIR FORCE BASE, FLORIDA

FROM: 3246 TW/TFR

22 Sep 92

SUBJ: Response To Nuclear Regulatory Commission Notice of Violation (NOV), RIC Permit 09-30031-1AFP, Docket 040-08883

TO: 3200 SPTW/SGPB
HQ AFMOA/SGPR

1. The Nuclear Regulatory Commission (NRC) conducted an unannounced compliance inspection on 5 - 7 May 92. NRC inspection report 030-28641/92-03 notice of violation (NOV) was received 17 Sep 92 delineating three Severity Level IV Violations.

2. All findings are concurred in. The following explanatory comments are herein provided as background on the violations as well as corrective actions to prevent further occurrences:

NOV C. 1. indicates that 55 gallon drum containers of depleted uranium waste stored within the radiation control area at building 9577 did not bear any label identifying the radioactive contents, and the containers were not excepted from such labeling. This finding is concurred in. The subject containers are filled with local soil contaminated with depleted uranium in amounts equal to and above 35 pCi per gram. Subsequent to the inspection, all containers were properly marked by affixing AFTO Forms 9bs'. A discrepancy was found in that although proper labeling is required in the site operating procedures delineated in the permit, labeling requirements were inadvertently left out of the site operating procedures used by the site operating and maintenance contractor. Site operating procedures will be rewritten to include specific labeling requirements. In the interim, the site supervisor and site RSO have been verbally instructed on labeling requirements.

NOV C. 2. indicates that air samples were taken but not used for evaluating compliance requirements of 10 CFR 20.103. I concur that these measurements were not used in the prescribed manner. When the data were received, they were not used because the concentration implied by using the Minimum Detectable Activity (MDA) was not low enough to demonstrate compliance. Planning for the operation assumed a single sample to be taken per worker per shift. This would lead to an implied concentration equal to ten times the MDA per day, as the volume of the sampling pump is 2 l/min, or one tenth of the breathing volume of ICRP 26/30 report Reference Man. Due to the heat stress conditions of the range during this operation, the work-rest cycle was one hour on, one hour off. A field decision to issue a new sampling media with each entry was made in anticipation of problems of excessive handling of the sampling media, either contamination of the media (giving rise to a false positive result) or, more importantly, that material captured during the procedure might be shaken off and lost (giving rise to a false negative result). As a new sample was generated per work-rest cycle, this led to the accumulation of forty times the MDA as the possible exposure. This neither demonstrates compliance nor non-compliance, a condition not anticipated during planning. I will insure that in the future we will have better air sampling technique so that we can unamoiguously demonstrate compliance. We will both utilize area samplers and insure that breathing zone samples are taken in such a fashion that the uncertainty of the measurements does not exceed the allowable concentration. All evaluations performed will be documented in the permit folder, to include the signature of the RSO.

ATCH 3

NOV C. 3. indicates that bioassay results were not utilized for timely detection and assessment of individual uptakes. We will inform our laboratory of our requirements for prompt turnaround. We will institute a tracking system for the samples to insure they arrive and are processed in a timely fashion. If we cannot achieve assay within the window which would allow us to obtain timely samples for confirmation of positive results, we will obtain additional samples within the window so that confirmation opportunity is not lost.

3. Please be assured that we are very concerned about the findings and every effort will be made to prevent future occurrence.

HARRY C. HARRIS
Permittee for RIC Permit
#09-30031-1AFP

R. D. BALLARD, Sr
Director of Range Systems

DEPARTMENT OF THE AIR FORCE
1ST SPECIAL OPERATIONS WING (AFSOC)
HURLBURT FIELD, FLORIDA 32544-5000

From: 20 SOS/CC

Subj: Reply to 18 May 92 NRC Compliance Inspection Report

To: 1 SOW/DO
1 SOW/CC
AFDTC/SGB
IN TURN

21 September 1992

Re: 1 SOW /CC Permit No. 09-30177-1AFP

1. Item 6.a. (Apparent violation of 10 CFR 20.203(f).)

a. IBIS sources in their original shipping boxes were temporarily stored in an unmarked lockable metal file cabinet for short periods between the issue of a new source from base supply and the return of the old source back to base supply. Sources were usually stored for a period of 24 hours.

b. After being made aware of the requirement to label the cabinet, storage in the cabinet was temporarily discontinued. Use of the cabinet for storage was not resumed until a sign was procured from Eglin Bioenvironmental Engineering. The sign is now displayed on the cabinet anytime it is used to store IBIS sources.

c. IBIS sources stored in WRSK, although on the 1 SOW /CC permit, are physically managed by base supply. Upon being made aware of the requirement to label the WRSK containers, labels were procured and are now attached to the containers.

2. Item 6.b. (Apparent violation of 10 CFR 71.5(a).)

a. IBIS sources surveyed were in their original packaging as received from WR-ALC through the supply system. Sources were returned to base supply in their original packaging. Base supply repackages sources to conform to 10 CFR 71.5(a) when original packing is inadequate.

b. Recent issues of IBIS sources from WR-ALC through base supply have improved packaging and are double-boxed. The inner box is foam lined and is enclosed in an EMI shield. The outer box is foam lined and the inner box nests in the foam.

3. POC is TSgt Dale K. Robinson, 1 SOW IBIS Program Manager, 20 SOS/OGOMGC, 884-6041.

RUSSELL E. RALIF, JR. Lt Col, USAF
Commander, 20 SOS

cc: 834 ABW/CC

ATCH 1

FROM: LGSCW (TSgt Kemp, 5188)

21 September 1992

SUBJ: IBIS INDICATOR

TO: LGSP (CMSgt Lee)

CORRECTIVE ACTION on 6a: All IBIS indicators are now stored on the short side of the bulk pallets in Helo WRSK. All boxes now have visible markings and a radic-active materiel sticker.

Ronald H. Gray

RONALD H. GRAY, CMSgt, USAF
Supply Mgr, Combat Operations Flight

ATCH 5

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 834TH AIR BASE WING (AMC)
Hurlburt Field, Florida 32544-5000

REPLY TO
ATTN OF: 834ABW/TRTFP (4-7227)

22 September 1992

SUBJECT: Packaging of Inflight Blade Integrity System (IBIS)

TO: AFDTC/SGB MGT 2 Sep 92
ATTN: Capt Tiedemann
Eglin AFB FL

Item comes to the packing & crating section in a fiberboard box that fits the IBIS. It is then placed in a XA6 fast pack reuseable container, NSN 8115-00-134-3656, dimension 14"X14"X16. Container is taped closed and marked on label side and opposite side with "This Package Conforms To The Conditions and Limitations Specified in 49CFR 173.422 for excepted Radioactive Material, Instruments and Articles", UN2910.

MERLE F. Wine,WS-06, USAF
Packing and Crating Supervisor

ATCH 6

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MEDICAL OPERATIONS AGENCY
BROOKS AIR FORCE BASE, TEXAS

FROM: HQ AFMOA/SGPR
Brooks AFB TX 78235-5000

25SEP1992

SUBJ: Transportation Discrepancies in Shipments of Inflight Blade Integrity System (IBIS) Sources

TO: SEE DISTRIBUTION LIST

1. A recent Nuclear Regulatory Commission (NRC) inspection identified discrepancies in shipping of radioactive IBIS sources by one of our permittees. The NRC issued a Notice of Violation (NOV) that required a written response from the Air Force. Titles 10 and 49, Code of Federal Regulations (CFR), are explicit on the requirements for transportation of radioactive material (RAM). The Air Force shipper failed to verify that packages containing IBIS sources met these requirements.

2. IBIS shipments may qualify as an instruments/articles (UN 2911) shipment. They may be excepted from specification packaging and labeling as RAM, but only if the activity limits and the surface dose rate limits (0.5 millirem/hr) specified in 49 CFR 173.422 are met. Proper monitoring of external radiation fields must be done before the packages are released to a common carrier. We use both 100 microcurie and 500 microcurie versions of the IBIS, and their radiation characteristics differ.

3. Measurements of the radiation field must be made in contact with all surfaces of the package using a properly calibrated instrument such as an AN/PDR-27. This measurement differs from the determination of Transportation Index (TI), which is measured at one meter. An IBIS shipment cannot be classified as an "instruments/articles" excepted package until all conditions in 49 CFR 173.422 and 49 CFR 173.443 are verified.

4. This information in provided to assist you in avoiding shipping errors with IBIS sources. Local refresher training of user, packaging, and transportation personnel on proper shipment of RAM is critical to Air Force efforts to eliminate transportation discrepancies and violations. This letter has been coordinated with HQ USAF/LGTT. Please call us at DSN 240-3331 if you have any questions.

David C Adams

DAVID C. ADAMS, MAJOR, USAF, BSC
Chief, Licensing Actions
USAF Radioisotope Committee Secretariat
Office of the Surgeon General

1 Encl

DISTRIBUTION LIST:

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Hill AFB UT 84056-5000

OO-ALC/QL
Hill AFB UT 84056-5000

301 ARS/MAO
Homestead AFB FL 33039-5000

1 SOW/CC
Hurlburt Field FL 32544-5000

834 ABW/CC
Hurlburt Field FL 32544-5000

33 ARS/LGMQ
APO AP 96368-5000

353 SOW/MAH
APO AP 96368-5000

129 ARG/DCM
NAS Moffett Field CA 94035-5000

41 ARS/CC
Patrick AFB FL 32925-6427

939 CAMS/MAOF
Portland IAP OR 97218-2797

WR-ALC/LUH
Robins AFB GA 31098-5340

WR-ALC/DST
Robins AFB GA 31098-5340

305 ARRS/MAQ
Selfridge ANGB MI 48045-5037

106 CAMS/MA
Suffolk County ANGB NY 11978-1294

667 SOMS/MAM
APO AE 09405-5000

HQ USAF/LGTT
The Pentagon
Washington, DC 20330-5130

ANGRC/SGB/LGT
Building 3500
Andrews AFB, Maryland 20331-6008

AURH/SGPB/LGT
Maxwell AFB, Alabama 36112-5304

HQ ACC/SGPB/LGT
162 Dodd Blvd, Suite 100
Langley AFB, Virginia 23665-5578

HQ AFMC/SGB/LGT
Wright-Patterson AFB, Ohio 45433-5001

HQ AFRES/SGB/LGT
Robins AFB, Georgia 31098-6001

HQ AFSPACECOM/SGB/LGT
Peterson AFB, Colorado 80914-5001

HQ AMC/SGPB/LGT
Scott AFB, Illinois 62225-5001

HQ ATC/SGPB/LGT
Randolph AFB, Texas 78150-5001

HQ PACAF/SGPB/LGT
Hickam AFB, Hawaii 96853-5001

HQ USAF Academy/SGPB/LGT
United States Air Force Academy
USAF Academy, Colorado 80840-5470

HQ USAFE/SGPA/LGT
APO AE 09094-5001

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE OFFICE OF MEDICAL SUPPORT
BROOKS AIR FORCE BASE, TEXAS 78235-5000

28 AUG 1991

REPLY TO ATTN OF: SGPR

SUBJECT: NRC Information Notice No. 91-39: Compliance with 10 CFR Part 21, "Reporting of Defects and Noncompliance"

TO: ALL PERMITTEES

1. The attached notice is provided for your information in accordance with conditions of the Air Force Master Materials License.

2. Please note that while 10 CFR Part 21's focus is reactor licensees, it is also applicable to materials licensees. No response is required, this information should be used as an aid to proper reporting of defects and noncompliance.

3. Call us if you have any questions. We can be reached at DSN 240-3331.

David G. Wood, Colonel, USAF, BSC
Executive Secretary
USAF Radioisotope Committee
Office of the Surgeon General

1 Atch
NRC Info Notice No. 91-39

cc: HQ USAF/SGP w/o Atch
Distribution List 2

Atch 3