

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION

REGION IV

NRC Inspection Report: 99990004/85-07

License: IDA-207 (Idaho)  
NRC General License

Licensee: Northwest X-Ray, Inc.  
ATTN: William H. Shamel  
107½ West 17th Street  
Idaho Falls, Idaho 83401

Facility: Idaho Falls Office

Inspection At: Idaho Falls facility on July 1, 1985; temporary jobsite near  
Cutbank, Montana on June 13, 1985

Inspection Conducted: June 13 and July 1, 1985

Inspector:

*D. B. Spitzberg*  
D. B. Spitzberg, Radiation Specialist

7-29-85  
Date

*L. Ricketson*  
L. Ricketson, Radiation Specialist

7-29-85  
Date

Approved:

*R. J. Everett*  
R. J. Everett, Chief, Nuclear Materials  
Safety Section

7-29-85  
Date

Inspection Summary

Inspection Conducted June 13 and July 1, 1985 (Report: 99990004/85-07)

Areas Inspected: Special, unannounced inspection of licensed activities conducted in non-Agreement States under the provisions of reciprocity. The inspection included reviews of organization, management, and training; inspection of a temporary jobsite location; and independent measurements. The inspection on July 1, 1985, was announced in advance.

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The inspection involved 7 inspector-hours onsite by 2 NRC inspectors.

Results: Within the three areas inspected, one violation containing four parts was identified in two areas as follows:

- a. Use of unauthorized individuals to perform licensed activities (Section 2).
- b. Failure to maintain documentation certifying one individual's qualifications to act as a radiographer (Section 2).
- c. Failure to maintain current utilization logs (Section 3).
- d. Failure to file a Form NRC-241 for work performed on two occasions in non-Agreement States (Section 2).

## DETAILS

### 1. Persons Contacted

\*W. H. Shamel, President/Radiation Safety Officer (RSO)  
N. G. Shamel, Secretary  
G. A. Brown, Radiographer  
D. Peters, Radiographer  
G. Vaidnais, Radiographer  
R. Burr, Helper  
R. Coleman, Helper

\*Telephonic exit briefing on June 24, 1985.

### 2. Organization, Management, and Training

The NRC inspectors discussed the licensee's organizational structures with the President/RSO on July 1, 1985. Northwest X-Ray, Inc., is a small company employing a total of two radiographers, two helpers, and a secretary on a regular basis. The staff size had been increased according to the company's workload. In January 1985 a contract was entered into by the licensee to perform radiography on a pipeline near Cutbank, Montana, during the summer of 1985. At the time, the licensee had planned to use the available personnel and add an additional radiographer all of whom would be listed on the State of Idaho License IDA-207. As the start date for the work approached, one of the radiographers became disabled and the licensee saw the need to add additional radiographers to the staff.

On May 13, 1985, a completed Form 241 was submitted to the Region IV office requesting reciprocity for the job and listing four individuals as authorized licensee personnel. Only two of these individuals were listed on the state license. Region IV sent an acknowledgement letter dated May 21, 1985, to the licensee stating that only the two individuals specified on the license were authorized to perform the work. During the unannounced jobsite inspection conducted on June 13, 1985, near Cutbank, Montana, it was observed that two individuals not authorized by the license were engaged in licensed activities. Although a request had been made to add the individuals to the license, the NRC inspectors confirmed with the State on June 19, 1985, that the request had not been approved. This was identified as a violation of License Condition 11, Idaho License IDA-207.

During the inspection on July 1, 1985, the NRC inspectors reviewed utilization logs of past jobs performed by the licensee. Most licensed activities had been performed in Idaho, however work was noted to have been performed in Montana during June and July, 1984, and on March 25, 1985. The licensee stated that a Form 241 request had been submitted for the former work but not for that during March 1985. No records of a

Form 241 were on file for either job in the licensee's file or the NRC file. This was identified as a violation of 10 CFR 150.20(1).

The NRC inspectors reviewed the qualifications and training of all individuals who had performed licensed activities in non-agreement states and found that all had been instructed in the company's operating and emergency procedures and had passed written and practical examinations as required. One individual, however, who was hired on May 19, 1985, and who performed licensed activities in Montana from May 21 through June 14, 1985, did not have documentation on file of his previous training and experience as required by the licensee's procedures. This was identified as a violation of License Condition 18. The licensee subsequently submitted a letter dated July 2, 1985, confirming that the individual met the qualifications criteria in the license and had received assurances from his previous employer that records certifying this information would be sent to the licensee.

Three examples of noncompliance with 10 CFR 150.20 were identified.

3. Temporary Jobsite Inspection

On June 13, 1985, the NRC inspectors made an unannounced inspection of the pipeline work being performed near Cutbank, Montana, by the licensee. Three two man crews were on site performing radiography with three exposure devices transported in mobile darkrooms. The licensee's personnel were found to be wearing TLD's and pocket dosimeters. Procedures were available in each vehicle as were calibrated survey instruments. Each vehicle was noted to be placarded and carrying the proper shipping papers. The NRC inspectors reviewed the crews' utilization logs and found that one of the individuals who was identified previously as not having license authorization, had not maintained his log current with respect to dates and use locations. This was identified as a violation of 10 CFR 34.27.

Several radiographic exposures were witnessed by the inspectors who noted that proper surveillance of the restricted area was maintained and that surveys were conducted as required.

One example of noncompliance with 10 CFR 150.20 was identified.

4. Independent Measurements

The NRC inspectors performed surveys of the restricted areas and exposure devices during the inspection and found both to be within the applicable limits.

5. Exit Briefing

The licensee representative identified in Section 1 was telephoned by the lead NRC inspector on June 24, 1985, to discuss the findings of the NRC inspection.