UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

FEB 7 1985

MEMORANDUM FOR: Leonard Cobb, Chief
Safeguards and Materials Programs Branch, IE

FROM: Donald R. Chapell, Deputy Director
Division of Fuel Cycle and Material Safety

SUBJECT: REVISION OF IE 2800, MATERIALS INSPECTION PROGRAM

This is in response to your memorandum of January 15, 1985 that asked for comment on IE 2600, Materials Inspection Program.

We recommend changes in the priority assignment in "Table 3 Program Codes." The changes are on the attached markup.

Section 2800-03.03 should begin "When a new license is issued by the regional office . . ."

Sections 2800-04, 2800-05, and 2800-06 deal with changing an assigned inspection frequency. You should identify who is authorized to make changes, and provide more concrete guidance about when changes are indicated.

On a broader plane, we reiterate our concern, which has been raised in the past, that materials licensees are not receiving sufficient inspection oversight. We also recognize that you must operate within budget limits. Given these dichotomous needs, we recommend that we meet to discuss the feasibility of alternative inspection methods, for example:

1. Triggered inspection--precipitated by a significant program change such as new Radiation Safety Officer or authorized user or significant change in type of use or inventory limit.

2. Announced telephone inspection--suitable for licensees that have a good safety record or where the main hazard is loss of control of a gauge or self-shielded irradiator.

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In this vein, it is also appropriate to consider what precipitates non-compliance. In many cases it appears that non-compliance may be caused by unclear standards, ignorance, or forgetfulness rather than laziness or cost-cutting. If the former are the causes rather than the latter, perhaps some licensing and inspection time would be better spent on alternative measures. We would like to meet to discuss this.

The licensing staff is also reviewing the inspection procedures and would like to comment on them at a later date.

Donald R. Chapell, Deputy Director
Division of Fuel Cycle and
Material Safety

Enclosure: As stated

Table 3 PROGRAM CODES

Programs Code	Category Title	Inspection Category	Priority
01100	Academic Type A Broad	F1A	2
01110	Academic Type B Broad	F1B	3
01120	Academic Type C Broad	F1C	5
01200	Academic Other (Secondary Code)	---	--
02110	Medical Institution Broad	G1	2
02120	Medical Institution Other - Group	G	3
02121	Medical Institution Other - Nongroup - Includes Diagnostic-Limited Therapeutic	G2	5
02200	Medical Private Practice - Group	G	3
02201	Medical Private Practice - Nongroup - Includes Diagnostic-Limited Therapeutic	G2	5
02210	Eye Applicators Strontium-90	G2	5
02220	Nuclear Medical Vans	G	3
02300	Teletherapy	G3	3
02400	Veterinary Nonhuman	G2	5
02410	In Vitro Testing Laboratories	G2	5
02500	Nuclear Pharmacies	G1	2 1
02510	Medical Product Distribution - 32.70	B	1
02511	Medical Product Distribution - 32.72	B	1
02512	Medical Product Distribtuion - 32.73	B	1 3
02513	Medical Product Distribution - 32.74	B	1
03110	Well Logging Byproduct and/or SNM Tracer and Sealed Sources	E	3
03111	Well Logging Byproduct and/or SNM Sealed Sources Only	E	3 1
03112	Well Logging Byproduct Only-Tracers Only	E	3
03113	Field Flooding Studies	E	3
03120	Measuring Systems Fixed Gauges	K	7
03121	Measuring Systems Portable Gauges	E1	5
03122	Measuring Systems Analytical Instruments	E2	6
03123	Measuring Systems Gas Chromatographs	K	7
03124	Measuring Systems Other	K	7
03211	Manufacturing and Distribution Type A Broad	B	1
03212	Manufacturing and Distribution Type B Broad	E	3

Programs Code	Category Title	Inspection Category	Priority	
03213	Manufacturing and Distribution Type C Broad	E1C	5	
03214	Manufacturing and Distribution Other (includes small quantities <10 millicuries per container) or Medical Distribution but no Manufacturing	E	3	
		E	3	
03218	Nuclear Laundry	E	3	
03220	Leak Test Services Only	K	7	
03221	Instrument Calibration Services Only <100 Curies	K	7	
03222	Instrument Calibration Services Only >100 Curies	E	(3)	7
03223	Leak Test and Instrument Calibration Services <100 Curies	K	7	
03224	Leak Test and Instrument Calibration Services >100 Curies	E	3	
03225	Other Services	K	7	
03232	Waste Disposal Service Prepackaged Only	D1	(2)	1
03233	Waste Disposal Service Incineration	D	1	
03234	Waste Disposal Service Processing and/or Repackaging	D	1	-
03235	Incineration-NonCommercial (Secondary Code)			
03240	General License Distribution -32.51	E	3	
03241	General License Distribution -32.53	E	3	
03242	General License Distribution -32.57	E	3	
03243	General License Distribution -32.61	E	3	
03244	General License Distribution -32.71	E	3	
03250	Exempt Distribution -32.11	E2	(6)	3
03251	Exempt Distribution Time Pieces -32.14	E	3	
03252	Exempt Distribution -32.17	E	3	
03253	Exempt Distribution -32.18	E	3	
03254	Exempt Distribution -32.22	E	3	
03255	Exempt Distribution -32.26	E	3	
03310	Industrial Radiography Fixed	C	(1)	2
03320	Industrial Radiography Temporary Job Sites	C1	1	
03510	Irradiators Self Shielded <10,000 Curies	E	(3)	5
03511	Irradiators Other <10,000 curies	E	(W)	3
03511	Irradiators Under Construction	E4	W	R

Program Code	Category Title	Inspection Category	Priority
03520	Irradiators Self Shielded >10,000 Curies	E	3 5
03521	Irradiator Other >10,000 Curies	E3	1
03521	Irradiators Under Construction	E4	W R
03610	Research and Development Type A Broad	E1A	3
03611	Research and Development Type B Broad	E1B	3
03612	Research and Development Type C Broad	E1C	5
03613	Research and Development Multisite-Multiregional Type A Broad (Secondary Code)	B1	1
03620	Research and Development Other	E	3
03710	Civil Defense	K	7
11200	Source Material Other <150 Kilograms	E	3
11210	Source Material Shielding	E	3 7
11220	Source Material Military Munition Test	K	7 3
11230	Source Material General License Distribution - 40.34	E	3
11300	Source Material Other >150 Kilograms	E	3 1
11700	Rare Earth Extraction and Processing	E	3 2
21310	SNM Plutonium - Neutron Source Greater Than 200 Grams at Universities	E1C	5
21320	SNM Plutonium - Neutron Source Greater Than 200 Grams Other Than Universities	E1C	5
22110	SNM Plutonium - Unsealed, Less Than Critical	A	2
22111	SNM U-235 and/or U-333 Unsealed, Less Than Critical	A	2
22120	SNM Plutonium - Neutron Source Less than 200 Grams	E2	6 7
22130	Power Sources Byproduct and/or SNM	K	7
22140	SNM Plutonium - Sealed Sources in Devices	F	6
22150	SNM Plutonium - Sealed Sources Less Than Critical	F	6 7
22151	SNM U-235 and/or U-233 Sealed Sources Less Than Critical	F	6
22160	Pacemaker Byproduct and/or SNM Medical Institution	K	7

Program Code	Category Title	Inspection Category	Priority
22161	Pacemaker Byproduct and/or Individual	K	7
22162	Pacemaker Byproduct and/or Manufacturing and Distribution	B	1
22170	SNM General License Distribution-70.39	B	(1) 3
05100	Sealed Source Review (none)	-	-
05200	Device Review (none)	-	-

E N C L O S U R E 6

INSPECTION TOPICS VS METHODS OF INSPECTION

Taken from Two Reports of Inspections of Hospitals

INSPECTION A

INSPECTION TOPICS VS METHODS OF INSPECTION

Taken From a Full Report of a Hospital Inspection

	Topics		How Inspected
1.	Organization	1.	Not stated how compliance was determined.
2.	Internal audits	2.	Interviews and review of records.
3.	Training and qualifications of personnel	3.	Asked for names of physicians who read and interpreted diagnostic scans.
4.	Radiation protection procedures	4.	Report didn't say how compliance was determined.
5.	Use of Materials	5.	Reviewed records of performance checks of the dose calibrators and the inventory of brachytherapy sources.
6.	Storage of Materials	6.	Inspector observation
7.	Facilities	7.	Report didn't say.
8.	Instruments	8.	Report didn't say.
9.	Receipt and transfer of materials	9.	Reviewed records of receipts and package surveys.
10.	Personnel Protection	10.	Reviewed records of radiation exposure, and of surveys of radiation and contamination.
11.	Waste Disposal	11.	Reviewed the waste disposal procedures and records.
12.	Notifications and Reports	12.	Asked technologist if there had been any misadministrations, overexposures, thefts of material or loss of material that had not been reported.
13.	Posting of Notices	13.	Observed that required notices were posted.
14.	Independent measurements by the inspector	14.	Apparently none were made.

INSPECTION B

	Topics		How Inspected
1.	Organization	1.	By discussion with hospital Administrator
2.	Internal Audits	2.	By interview.
3.	Training and qualifications of personnel	3.	Interview of the one nuclear medicine technician on the staff (had received no formal training)
4.	Radiation protection procedures	4.	By interview of person who was supposed to execute them.
5.	Storage of materials	5.	Asked technician to demonstrate how he performed Mo-99 breakthrough test (he couldn't do it). Records indicated the test was performed as required. Observation that there were no sources for daily checks of the dose calibrator.
6.	Storage of materials	6.	Observation.
7.	Facilities	7.	Observation.
8.	Instruments	8.	Observation of instrument performance.
9.	Receipt and transfer of materials	9.	Records and interview.
10.	Personnel protection	10.	Review of vendor film badge reports. Observation of how technician was wearing the badge (improperly).
11.	Waste Disposal	11.	Interview and independent measurements of waste.
12.	Notifications and reports	12.	Not mentioned in the report.
13.	Posting of notices	13.	Not mentioned in the report.
14.	Independent measurements	14.	Measured radiation levels on surfaces and in areas where radioisotopes were being used.

UNION OF CONCERNED SCIENTISTS 1346 Connecticut Avenue, N.W. • S. 1101 • Washington, DC 20036 • (202) 296-5600

28 January 1985

Mr. J. M. Felton, Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

FREEDOM OF INFORMATION ACT REQUEST
FOIA-85-69
Rec'd 1-29-85

Dear Mr. Felton:

Pursuant to the Freedom of Information Act, please make available at the Commission's Washington, D.C., Public Document Room copies of documents in the following categories:

A. All data reports and technical reports concerning the steel containment test series at Sandia National Laboratories.

B. All NRC documents evaluating the results of the steel containment test series.

C. All documents generated by any peer review committees established to advise NRC and/or Sandia National Laboratories concerning the performance of the steel containment test series and interpretation of the test series results.

If there are any questions concerning this request, please contact me directly at 202-296-5600. Thank you for your prompt response to this request.

Sincerely,

Steven C. Sholly

Steven C. Sholly
Technical Research Associate

8506050366 (1p)

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