

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 85-02

License No. 04-19522-01

Priority 1

Category C1

Licensee: Boothe-Twining, Inc.
 1326 Del Norte Road
 Camarillo, California 93010

Facility Name: (Same as above)

Conference at: (Address above)

Conference conducted: May 30, 1985

Participants: J. L. Montgomery
 J. L. Montgomery, Chief, NMSS Branch

6/26/85
 Date Signed

R. D. Thomas
 R. D. Thomas, Chief, NMS Section

6/26/85
 Date Signed

Approved by: R. A. Scarano
 R. A. Scarano, Director
 Division of Radiation Safety and Safeguards

7/1/85
 Date Signed

Summary:Enforcement Conference on May 30, 1985 (Report No. 85-02)

The following matters were discussed:

1. The violations identified during the last inspection
2. NRC enforcement options
3. NRC concerns
4. Licensee management responsibilities

The enforcement conference involved a total of two hours, utilizing two NRC representatives.

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DETAILS

1. Enforcement Conference Participants

S. Williams, Vice President, Boothe-Twining, Inc.
F. Stough, RSO, Boothe-Twining, Inc.
J. Montgomery, Chief, Nuclear Materials Safety and Safeguards Branch, NRC
R. Thomas, Chief, Nuclear Materials Safety Section, NRC

2. Enforcement Conference

On May 30, 1985, an enforcement conference was held at Boothe-Twining, Inc., Camarillo, California with the individuals listed above participating. The enforcement conference was related to the safety inspection conducted on May 9, 1985. The activities conducted are authorized by NRC License No. 04-19522-01. The enforcement conference was announced in a letter to the licensee dated May 23, 1985. A copy of that letter is attached.

Mr. J. Montgomery, NRC, stated that the purpose of the enforcement conference was based upon the results of the recent inspection which was conducted on May 9, 1985. Based upon the results of the inspection which identified six violations, five of which were Severity Level IV violations. Mr. Montgomery expressed the need for a strong participation on the part of management to control the overall licensed program. It was stressed that management involvement in the licensed program is one of the most significant requirements in maintaining an acceptable radiological safety program.

Mr. R. Thomas, NRC, reviewed the past enforcement history of the licensee for the period of February 9, 1982 to May 9, 1985. The individual violations which were identified during the last inspection were discussed in detail. Mr. Thomas also stressed the need for management involvement in the licensed program and a firm understanding of the conditions of the license.

Mr. F. Stough, licensee representative, asked if the NRC license requirement to audit a radiographer could be fulfilled while the radiographer was working on a job under the State of California license. To conduct the quarterly audits of radiographers only while they were at Vandenberg AFB was quite difficult since the job may be of only one day duration.

Messrs. Montgomery and Thomas, NRC, stated that an audit of a radiographer could be conducted during operations authorized by the Agreement State license if those records would be available for NRC inspection.

Mr. F. Stough, licensee representative, produced an audit record of a radiographer that had conducted activities on Vandenberg AFB; however, he was audited during the fourth quarter of 1984 while working under the Agreement State license. Mr. Stough requested that the violation cited against 10 CFR 34.11(d) be withdrawn based upon the NRC Agreement stated above.

Mr. J. Montgomery, NRC, examined the audit report and stated that the violation related to the quarterly audit for the fourth quarter of 1984 would be withdrawn.

Mr. J. Montgomery, NRC, explained the enforcement policies and procedures as published in 10 CFR 2, Appendix C. Copies of the enforcement policy were given to the licensee. Escalated enforcement actions such as civil penalties, order to modify, suspend, or revoke license, and orders to cease and desist were discussed. The relative significance of the different severity levels was explained.

At this point in the meeting, Mr. R. Boothe, President of Boothe-Twining, Inc., arrived, introduced himself and joined in the discussions. Mr. Montgomery briefed him on what had taken place and expressed NRC's concern for his licensed program.

Mr. R. Boothe, licensee representative, stated that radiological safety had been assigned to Mr. F. Stough on a full time basis which should improve the radiological safety program.

3. Conclusions

With the exception of the quarterly audit violation, the licensee agreed with the citations and described his plans for preventing recurrence. The licensee's response to the enforcement conference was acceptable. A commitment on the part of management for a stronger management control of the radiological safety program was made.

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Please Verify if Detainees
are to be placed in
the PRR.

Thanks
Jim
McKinnight

Yes Jim I checked
w/ Montgomery
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