

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket No.: 030-28641

License No.: 42-23539-01AF

Report No.: 030-28641/96-16

Licensee: Department of the Air Force

Facility: Brooks Air Force Base (AFB)

Location: San Antonio, Texas

Dates: November 19-22, 1996

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Attachment: Supplemental Inspection Information

## EXECUTIVE SUMMARY

Department of the Air Force  
NRC Inspection Report 030-28641/96-16

This report documents the annual inspection of activities conducted by the Department of the Air Force (USAF) under NRC License 42-23539-01AF during the 1996 calendar year. The inspection included a review of activities conducted under permits issued in accordance with the license, the permitting process established under the license, the inspection program established by the USAF, and oversight of program activities by the USAF Radioisotope Committee (RIC).

### Management Organization and Controls

- Administration of the master material license by the USAF RIC during this inspection interval generally has been effective. However, one concern was identified involving the timeliness and thoroughness of the RIC's review of events reported by USAF permittees and the RIC's resolution of inspection findings (Section 2).

Membership of the RIC was found to be as described in the license application. The organizational structure and staffing levels were determined to be acceptable (Section 2).

### Regulations and Procedures

- The licensee had established regulations, policies and procedures that were consistent with NRC regulations (Section 3).

### Permitting Function

- Generally, the RIC permit review process was consistent with NRC licensing policies. A review of several permitting actions found that documentation of some permit reviews were not complete and illustrated the need for more careful documentation by the RIC permit reviewers (Section 4).

### Inspection Function

- The Air Force Inspection Agency's (AFIA) inspection process was consistent with the NRC's inspection program. The AFIA's inspections appeared to have been thorough and the program was compatible with NRC Manual Chapter 2800 (Section 5).
- Some examples of inadequate followup to inspection findings were identified. For example, on several occasions permittees failed to describe the root cause of a violation and corrective actions to be taken to prevent future recurrence of a violation, and the RIC did not request supplemental information to the permittees' responses (Section 5).

Licensee Event Reports

- One concern was identified regarding the resolution of issues relating to events reported by permittees. The concern involved the adequacy of followup provided by the RIC (Section 6).
- The licensee was in compliance with 10 CFR Part 20 reporting and notification requirements (Section 6).

NRC Inspections at Air Force Installations

- The NRC inspections determined that, in general, the appropriate level of oversight had been provided for permitted activities and that activities had been conducted in accordance with NRC requirements and the conditions of the permits (Section 7).

Report Details

**1 USAF Radioisotope Committee (RIC) Status**

The USAF RIC is authorized under NRC License 42-23539-01AF to issue radioactive material permits to USAF medical and industrial users of byproduct material. The license is a military master material broad scope license first issued on June 26, 1985. The license does not have an expiration date. At the time of the inspection the licensee was operating under Amendment 13 of the license.

The USAF RIC has been responsible for the oversight of use of radioactive materials at Air Force installations with the exception of nuclear weapons materials, certain radioactive parts of nuclear weapons systems, nuclear reactor systems, and parts and fuel controlled under Section 91b of the Atomic Energy Act.

The RIC Secretariat serves as the single point of contact between the RIC and NRC and has been responsible for administering the permitting program and monitoring inspection results and corrective actions. NRC Region IV has been delegated responsibility for inspection and licensing activities related to this program.

**2 Management Organization and Controls (87100)**

a. Inspection Scope

The organizational structure was reviewed to ensure that the licensee had established an organization with defined responsibilities and functions.

b. Observations and Findings

The RIC Secretariat staff located at Brooks AFB included four military positions (Chief of the Secretariat, two staff health physicists, one health physics fellow) and two civilian positions. The health physics fellow position is assigned to the RIC Secretariat every second year. The RIC Secretariat added two new staff members during this inspection period.

The two new members of the RIC Secretariat staff attended NRC's "Licensing Practices and Procedures" course this year. In addition, the licensee was developing an in-house formal training program for the staff. The inspectors reviewed the outline of the training manual and found it to be comprehensive.

The RIC was composed of both voting members and technical advisory members. In June 1996 a new Chairman of the RIC was appointed. The Chairman is the Associate Director of the Air Force Medical Operations Agency. The inspectors reviewed minutes of the RIC meetings held during 1996, and noted that the meetings appeared to have been well planned and were attended by the majority of the committee membership. However, it was noted that one voting member, the civil engineering representative, had not attended the meetings since this member position was created 2 years ago. Licensee representatives stated that steps had

recently been taken to rectify this situation, and that the individual appointed to the committee was expected to attend the fourth quarter 1996 committee meeting.

The inspectors noted that the meeting agendas were relevant to ongoing health and safety activities, and that the subjects discussed during the meetings were adequately documented. USAF RIC meetings held during the first three calendar quarters of 1996 were attended by either, or both, the NRC Region IV project manager for this license or a branch chief from the regional office. (The fourth quarter meeting is scheduled for December 1996.) NRC staff present at the meetings have generally found that meeting agendas were of sufficient scope and discussions held during the meetings included a sufficient level of detail.

Administration of the Master Material License by the USAF RIC during this inspection interval generally has been effective. However, one concern was noted during 1996 involving the RIC's followup and review of events reported by permittees and the RIC's resolution of inspection findings. These issues are discussed in detail in Sections 5 and 6, "The Inspection Function" and "Licensee Event Reports," of this report.

c. Conclusions

Membership of the RIC was found to be as described in the license application. The organizational structure and staffing levels were determined to be acceptable. One concern was identified involving the RIC's followup and review of events and inspection findings.

**3 Regulations and Procedures**

a. Inspection Scope

The inspector reviewed the licensee's compliance with the conditions of the USAF's NRC license, NRC requirements, and USAF regulations as they relate to use of licensed material.

b. Observations and Findings

Condition 12 of NRC License 42-23539-01AF specifies that U.S. Air Force regulations, policies, and directives governing the use of licensed material must be consistent with the Nuclear Regulatory Commission's regulations. The inspectors reviewed USAF policies and regulations to verify whether they were consistent with applicable NRC regulations.

The USAF has two governing documents that describe USAF policies and implementing guidance regarding the use of materials regulated by the NRC. The AFPD 40-2, "Radioactive Materials (Non-Nuclear Weapons)," prescribes USAF policies for use of radioactive materials regulated by the NRC, and the Air Force Instruction (AFI) 40-201, "Managing Radioactive Materials in the USAF," provides specific guidance to USAF installations on how to acquire, receive, store, distribute,

use, transfer, or dispose of radioactive materials. AFI 40-201 contains guidance on implementing policies specified in AFPD 40-2.

AFI 40-201 was currently under revision. The revision incorporated NRC requirements regarding timeliness of decommissioning of material facilities and financial surety requirements. In addition, the revision describes the RIC's new permit "streamlining" process and includes a clarification of radioactive waste disposal responsibilities. The licensee committed to providing a copy of the revised AFI 40-201 to the NRC upon issuance.

The RIC Secretariat was also developing radiation safety program manuals for each type of permittee. The manuals will provide permittees information on the requirements applicable to specific permit types (e.g., portable gauges, medical, etc.). The RIC planned to include in the manuals the applicable regulations, regulatory guides, NUREGS, and appropriate forms for the use by permittees. This initiative appeared likely to be successful in ensuring that permittees are aware of requirements applicable to their specific programs.

#### **4 The Permitting Function (87100)**

##### **a. Inspection Scope**

The inspectors reviewed a representative sample of USAF permits and permitting actions completed during the inspection period to determine whether the USAF permitting program was consistent with NRC licensing policies.

##### **b. Observations and Findings**

The USAF RIC oversight of 413 permits in the United States and overseas at the time of this inspection. The inspectors reviewed 14 permits issued between December 1995 and June 1996. (The RIC was experiencing computer problems during this inspection and permit data for June through November 1996 was unavailable.) During this inspection period, the RIC Secretariat processed the following: (1) 52 new permits, 70 amendment requests, 49 renewal applications, and 24 terminations. Approximately 70 percent of all permit actions authorized use of gauging devices containing sealed sources. The new permits issued during this inspection period authorized use of chemical agent monitors, soil gauges, fixed gauges, gas chromatographs, and static eliminators. Cases pending at the time of the inspection consisted of 20 new permit applications, 28 renewal applications, and 81 amendment requests (including terminations). The renewal applications were backlogged from a few months to 2 years.

The permit files were organized in a manner similar to the NRC Region IV filing system. However, the inspectors noted that some documents were missing from the files. The RIC reviewers were able to retrieve some of these documents, although others could not be located. Documents related to amendment requests from Eglin, Scott, and Patrick AFBs were either missing or incomplete as described below.



- Amendment 5, issued on December 1, 1995, for Eglin AFB, was not available. RIC representatives suspected that it was accidentally sent to be microfilmed along with other documents. The RIC obtained a copy from the permittee during the inspection.
- Amendment 4, involving designation of a new radiation safety officer change at Scott AFB, was not issued to the permittee despite its approval by the reviewer as evidenced by a permit cover letter located in the file. The RIC reviewer indicated that the permit amendment would be issued soon.
- No amendment request documentation was received by the RIC for Amendment 12 authorizing the addition of Neptunium sources at Patrick AFB. The permit was amended to add the sources with no written documents from the RIC reviewer or permittee. It appeared that the amendment was approved based solely on two telephone conversations that were briefly noted in the file; however detailed information about the permittee's request was not available. The telephone conversation dates and participants were listed in the permit tie down condition. RIC representatives indicated that this was not their usual policy for issuing an amendment. They concluded that this oversight may have been the result of a change in permit reviewers.

With one exception, the technical quality of the 14 cases reviewed was good. The RIC reviewers closely followed NRC guidance documents such as Standard Review Plans, Regulatory Guides, and NUREGS. The exception involved a request from the Virginia Beach AFB. The permittee requested, via e-mail, that the RIC grant a "waiver or variance" allowing a soil gauge relocation due to a failure to meet unrestricted controlled access criteria. The permittee's e-mail further stated that "if you do not respond by the date requested, I will take it as a YES." The permit file contained no documentation of this case review or whether the reviewer noted or responded to the permittee's e-mail request. The permit amendment authorizing the relocation was issued on April 25, 1996, 34 days after the date specified in the permittee's request. The RIC did not know if the RSO implemented the relocation prior to April 25, 1996. The inspectors also noted that the permittee did not submit a diagram of the relocation plan and provided only a vague description of the proposed gauge storage area. The inspectors noted that additional information should have been obtained to support the amendment request. Additionally, the RIC should have responded to the permittee's initial notification of its intent to relocate the gauge.

The RIC terminated 24 permits during 1996. All but one of the terminations were for permits authorizing possession of sealed sources. The exception involved a contaminated site on an air base in Japan. The inspectors reviewed records documenting the RIC's review of all termination requests and found the terminated permit reviews comprehensive.

Although no decommissioning plans were reviewed during this inspection, the inspectors did review the USAF's process for site remediation. Management of

remediation activities at Air Force bases varied depending on the type of material involved in the project. All work plans and health and safety plans for remediation of radioactive waste burial sites are submitted to Armstrong Laboratories and the Air Force Radioactive Waste Program Office for their technical review and comment during the project planning stage. Plans for sites containing or suspected to contain byproduct, source, or special nuclear material as defined in 10 CFR Parts 30, 40, and 70 are also submitted to the RIC Secretariat for review. Plans for sites containing or suspected to contain only 91b materials (as defined in the Atomic Energy Act and the Energy Reorganization Act of 1974) or naturally occurring or accelerator produced radioactive materials are submitted to other USAF organizations.

Final remediation reports for sites containing radioactive materials are sent to the RIC for archival purposes. The RIC Secretariat has determined that it will maintain all records pertaining to licensed material activities after permit termination.

c. Conclusions

Generally, the RIC permit review process was consistent with NRC licensing policies. A few examples were identified involving the RIC's failure to maintain adequate documentation of permitting actions, including information provided to support amendment requests. While none of these discrepancies were considered significant in terms of health and safety, they illustrated the need for more careful documentation by the RIC permit reviewers.

**5 The Inspection Function (87100)**

a. Inspection Scope

The inspectors reviewed inspection reports completed by the Air Force Inspection Agency (AFIA) in 1996 and other related documents issued by the RIC to determine whether the USAF inspection and enforcement policies were consistent with NRC policies.

b. Observations and Findings

The AFIA, located at Kirtland AFB, Albuquerque, New Mexico, is the USAF inspection agency responsible for conducting routine inspections at Air Force installations issued radioactive material permits. A health physicist with the AFIA has been delegated the responsibility of evaluating activities conducted under USAF permits to verify compliance with USAF and NRC regulations and permit conditions. The RIC Secretariat did not accompany the AFIA inspector on any routine inspections during 1996.

The inspectors' review of AFIA inspection reports revealed that final inspection reports were not always issued in a timely manner. Although the AFIA inspector generally issued preliminary reports of inspections findings to a permittee within days of the inspection, in some instances the final report was not issued until



several months later. For example, the inspection at the USAF Academy was conducted in December 1995; however, the final report was not issued until April 1, 1996. Because final inspection reports have been used by the RIC to issue requests for corrective actions, a request for corrective actions was not issued to the USAF Academy until April 12, 1996, approximately four months after the inspection was conducted.

When violations of NRC or USAF regulations, or the conditions of a permit, are identified, the RIC Secretariat requires the permittee to provide a written statement describing: (1) the reason for the violation or the basis for disputing the violation; (2) the corrective actions taken and the results of those actions; (3) the corrective actions that the permittee plans to take to prevent recurrence; and (4) the date when full compliance will be achieved. The required responses are identical to those specified in a Notice of Violation issued by the NRC.

Responses to the RIC's requests for corrective actions are directed to the RIC, the AFIA inspector stated that he does not normally receive copies of the responses for review (the inspector has received copies several months later when distributed during the quarterly RIC meetings). Thus, the AFIA inspector had not routinely participated in the review of permittee responses to determine whether proposed corrective actions adequately addressed the inspection findings.

The inspectors also found that NRC standard citations had not been in the AFIA's inspection documentation. The inspectors noted that violations described in USAF inspection documentation did not always contain sufficient detail describing exactly how a requirement was not met. Consequently, the violations were generally not descriptive enough to determine whether corrective actions proposed by permittees were adequate. A review of permittee responses to inspection findings disclosed that on several occasions, permittees failed to describe the root cause of the violation and the corrective actions to be taken to prevent recurrence of the violation. The inspectors also noted that the RIC had not requested supplemental information from the permittees to address these items.

The inspectors also noted inconsistencies in the issuance of requests for responses to inspection findings. The inspectors identified some instances where violations were documented in AFIA inspection reports and there were no records demonstrating that a request for a response to the violations was ever issued to the permittee. In discussing this issue, RIC representatives stated that they did not routinely request responses from permittees for violations that have little safety significance or those related to isolated events. However, the inspectors could not determine whether this policy was implemented in order to be consistent with changes in the NRC Enforcement Policy or for other reasons.

The AFIA inspection program has generally been implemented under guidelines similar to the NRC's inspection procedures. Inspection intervals had been set using priorities identified in NRC Inspection Manual Chapter (MC) 2800. However, the inspectors noted that the RIC Secretariat had not modified the inspection schedule for USAF permittees to match inspection priorities identified in the revised

MC 2800. Although the RIC was provided a copy of the revised manual chapter, inspection priorities in the RIC's data base system still had permittees listed at the old inspection priorities. This was noted to RIC representatives during the inspection because the data base is used to establish inspection schedules for the AFIA inspector. The inspectors also discussed provisions in the revised manual chapter for reducing or extending inspection intervals based on licensee performance. The AFIA inspector stated that he had not extended any inspection intervals for USAF permittees, although he was aware of the provision in the manual chapter.

The inspectors also noted that two inspections (permits at Dover and Hickam AFBs) appeared to be past due. Specifically, both bases were identified as priority 5 permittees meaning that they are to be inspected every 5 years. Records showed that Dover AFB was last inspected on October 28, 1990, and Hickam AFB was last inspected on August 19, 1990; therefore, the inspections should have been performed by October 1995 and August 1995, respectively. The RIC was unable to confirm that inspections had been performed at these two bases within the past 5 years.

c. Conclusions

The AFIA inspection process was generally consistent with NRC inspection policy. The AFIA's inspections appeared to have been compatible with NRC's MC 2800.

A concern involving the adequacy of the RIC's followup to inspection findings was identified. This concern involved inconsistencies in requesting responses from permittees and failures to request supplemental responses from permittees when root causes of violations and corrective actions to prevent recurrence of violations were not identified in permittees' written responses. In addition, the inspectors noted that some violations were not adequately described in inspection documents. These findings indicate a need to devote further attention to documenting inspection findings and reviewing permittees' responses.

**6 Licensee Event Reports (87100)**

a. Inspection Scope

The inspectors reviewed licensee event reports generated during this inspection period to determine compliance with 10 CFR Part 20 reporting requirements.

b. Observations and Findings

During the 1996 inspection period, the licensee reported eight events to NRC, as summarized below. All of these events were reported to the NRC Operations Center as required by NRC regulations.

EVENT CLASSIFICATION	NUMBER REPORTED
Lost, Abandoned, or Stolen Radioactive Material	5
Release of Radioactive Material	3

The five events classified as lost, abandoned, or stolen radioactive materials involved lost radioactive material. The details of the events are as follows:

Lost Radioactive Material

- The loss of one 3M static meter containing 200 millicuries of tritium was reported to the NRC Operations Center on January 4, 1996. Location: Missouri Air National Guard, Missouri.
- The loss of four generally licensed "EXIT" signs containing 8 to 22.5 curies of tritium was reported to the NRC Operations Center on January 24, 1996. Location: Davis-Monthan AFB, Arizona.
- The loss of an 8 microcurie ( $\mu$ ci) americium-241 source when a USAF plane crashed in Saudi Arabia was reported to the NRC Operations Center on August 7, 1996.
- The loss of seven generally licensed "EXIT" signs containing 20 curies of tritium was reported to the NRC Operations Center on August 16, 1996. Location: Davis-Monthan AFB, Arizona.
- The loss of two Inflight Blade Inspection System (IBIS) sources containing 500  $\mu$ ci of strontium-90 was reported to the NRC Operations Center on September 16, 1996. Location: Kirtland AFB, New Mexico.

Release of Radioactive Material

- A generally licensed "EXIT" sign containing 7.4 curies of tritium was reported broken to the NRC Operations Center on March 2, 1996. Location: Scott AFB, Illinois.
- A generally licensed "EXIT" sign containing 9.5 curies of tritium was reported broken to the NRC Operations Center on June 6, 1996. Location: Otis AFB, Massachusetts.
- Dismantled aircraft components containing depleted uranium (DU) counterweights inadvertently shipped to a scrap yard in Missouri was reported to the NRC Operations Center on August 21, 1996. Location: Altus AFB, Oklahoma.

The notifications were reported in accordance with 10 CFR 20.2202 or 20.2201. All 30-day reports were submitted to the NRC as required by Subpart M of 10 CFR Part 20. Generally, the 30-day reports were thorough and provided the required information.

The inspectors reviewed two of the events during the inspection: 1) the loss of the two IBIS sources containing 500  $\mu$ ci of strontium-90, and 2) the dismantled aircraft components containing depleted uranium (DU) counterweights and inadvertently shipped to a scrap yard in Missouri. As part of its corrective actions for the loss of the IBIS sources, the RIC stated the USAF planned on changing the tracking system for IBIS sources by assigning one organization responsibility for maintaining IBIS sources (currently they are tracked by individual bases). After this assignment is made, a single permit will be issued to this organization. The RIC believed that by centralizing inventory control over IBIS sources, accountability for the sources would be improved.

With regard to the second event reviewed by the inspectors, the RIC had no additional information beyond what was documented in its written report. The DU counterweights were transferred to a scrap yard in August 1996, after they were physically processed at Altus AFB. Once the base radiation protection officer was made aware of the transfer, the USAF dispatched personnel to the scrap yard to retrieve the counterweights. The counterweights were retrieved and returned to the base. The licensee's 30-day written report documented actions taken by base personnel and by other USAF personnel to retrieve the counterweights.

On November 20-21, 1996, the NRC conducted a special inspection at Altus AFB, Oklahoma, in response to the dismantled aircraft components event. The inspection identified additional information regarding the event that was not disclosed in the licensee's 30-day report. Specifically, the inspection found that the vehicle (civilian-owned) used to transport the aircraft components containing the DU counterweights and the saws used to cut up the counterweights had never been surveyed for contamination. Although the licensee's 30-day report stated that the vehicle would be surveyed, the RIC was not aware that the vehicle had returned to the base several times after this incident and no survey was completed. In addition, other details relating to the release/transfer of the counterweights was not apparently not known to the RIC staff. (For additional details see NRC Inspection Report 030-28641/96-17 which was pending as of the date of this report). The inspectors noted that although the event had been reviewed by the RIC, the RIC staff did not follow through to ensure that all actions were completed.

c. Conclusions

The licensee had complied with 10 CFR Part 20 reporting and notification requirements. Although the RIC had reviewed all reported events, one concern was identified relating to the thoroughness of the RIC's reviews. This issue involved a failure to followup with a permittee to ensure that actions specified in the permittee's written report were implemented as described.

## **7 NRC Inspections of USAF Installations**

### **a. Inspection Scope**

During 1996, USAF installations were inspected by the NRC to assess the effectiveness of the licensee's program and to evaluate licensed activities at various bases.

### **b. Observations and Findings**

Routine, unannounced inspections and two special inspections were conducted by the NRC at 16 USAF installations. Results of the inspections are summarized in the table below. One violation of an NRC regulation was identified at 15 of the 16 facilities inspected (one inspection report has not yet been issued), and 14 of the installations inspected had clear inspection results. The special inspections were conducted in response to a reported event and to review a terminated license issued by the Atomic Energy Commission.

**AIR FORCE INSPECTIONS CONDUCTED IN 1996**

REPORT NUMBERS	PERMIT/LICENSE NUMBERS	AIR FORCE BASE/LOCATION	TYPE/DATES OF INSPECTION	FINDINGS
96-01	02-04762-1AFP	Scott (Illinois)	Routine March 18, 1996 Region III	Clear
96-02	35-30227-1AFP 35-10046-1AFP	Altus (Oklahoma)	Routine April 23, 1996 Region IV	Clear
96-03	30-10042-1AFP 30-30324-1AFP 30-30494-1AFP	Cannon (New Mexico)	Routine April 25, 1996 May 3, 1996 Region IV	Clear
96-04	29-30524-1AFP 29-30406-1AFP 29-10113-1AFP 29-30237-1AFP 29-30135-1AFP	McGuire (New Jersey)	Routine May 20, 1996 Region I	Clear
96-05	02-10092-1AFP 02-30303-1AFP 02-30323-1AFP	Luke (Arizona)	Routine May 9, 1996 Region IV	Clear
96-06	09-30271-1AFP 09-11975-1AFP 09-11975-1AFP 09-30348-1AFP 09-30476-1AFP	Patrick (Florida)	Routine May 23, 1996 Region II	<sup>1</sup> One Violation
96-07	15-30314-1AFP	McConnell (Kansas)	Routine May 21, 1996 Region IV	Clear
96-08	30-30273-1AFP 30-30389-1AFP 30-10075-1AFP	Holloman (New Mexico)	Routine June 3-4, 1996 Region IV	Clear
96-09	42-10090-1AFP	Laughlin (Texas)	Routine June 4, 1996 Region IV	Clear
96-10	15-30290-1AFP	<sup>2</sup> Forbes Field ANG (Kansas)	Routine June 5, 1996 Region IV	Clear
96-11	33-30457-1AFP	<sup>2</sup> Grand Forks ANG (North Dakota)	Routine June 3, 1996 Region IV	Clear



96-12	50-10019-2AFP 50-30342-1AFP 50-30518-1AFP 50-30533-1AFP	Eielson (Alaska)	Routine July 23, 1996 Region IV	Clear
96-13	09-15149-2AFP 09-30358-1AFP 09-30454-1AFP	Tyndall (Florida)	Routine July 15, 1996 Region II	Clear
96-14	50-01810-3AFP 50-10033-1AFP 50-30218-1AFP 50-30320-1AFP 50-30306-1AFP	Elmendorf (Alaska)	Routine July 18, 1996 Region IV	Clear
96-15	Terminated AEC 04-07177-02	Eielson (Alaska)	Special July 23, 1996 Region IV	Clear
96-16	42-23539-01AF	Brooks RIC (Texas)	Routine Annual November 18-22, 1996 Region IV	Clear
96-17	NA	Altus (Oklahoma)	Special November 20-21, 1996 Region IV	Pending

<sup>1</sup>Three examples were identified where the labeling of packages containing radioactive material for shipment were in violation of the NRC's and the Department of Transportation's regulations.

<sup>2</sup>Air National Guard

c. Conclusions

The NRC inspections determined that an appropriate level of oversight had been provided for permitted activities and that activities had been conducted in accordance with NRC requirements and the conditions of the permits.

**8 1996 Technical Assistance Requests**

a. Scope

This portion of the inspection included discussion of technical assistance requests generated in response to requests submitted to the NRC by the USAF. A summary of these actions is provided below.

b. Observations and Findings

Two Technical Assistance Requests (TAR) were generated submitted to the Office of Nuclear Material Safety and Safeguards for review during this inspection interval.

A summary of the TARs is provided below.

- The USAF requested clarification of certain requirements applicable to production and transfer of material currently regulated under Section 91b of the Atomic Energy Act. The TAR has been answered by NMSS and the USAF has been notified of NRC's determination.
- The USAF requested an amendment to their license to reflect compliance with those NRC policies and procedures which have been formally provided, and deemed applicable, to USAF operations. The TAR is remains open pending NMSS' response.

In addition, a response from a TAR issued in 1995 was received from NMSS during this inspection period. The TAR involved a request for authorization to use an alternative procedure for calibration of survey instruments. The USAF was provided the results of NMSS' review and the NRC is awaiting further information from the RIC.

#### Exit Meeting Summary

The inspectors presented the inspection results to RIC representatives at the conclusion of the inspection on November 22, 1996. Licensee representatives acknowledged the findings as presented.

Attachment

PARTIAL LIST OF PERSONS CONTACTED

Licensee

Representing Air Force Medical Operations Agency, Office of the Surgeon General, Bolling AFB, Washington, D.C.

Lieutenant Colonel Michael Parkinson, Associate Director  
Air Force Medical Operations Agency

Representing Air Force RIC Secretariat, Brooks AFB, San Antonio, Texas

Lieutenant Colonel Joseph J. Donnelly, Chief, RIC Secretariat  
Major Paul Feeser, Health Physicist  
Major Mitch Hicks, Health Physicist  
Captain Lonny Manning, Health Physicist  
Barbara L. Moore, Administrative Support Specialist  
Fidencio M. Gonzales, Support Services Assistant

INSPECTION PROCEDURES USED

IP 87100: Licensed Materials Program  
IP 88020: Operations Overview  
IP 88005: Management Organization

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS USED

AFB	Air Force Base
AFIA	Air Force Inspection Agency
AFI	Air Force Instruction
AFPD	Air Force Policy Directive
DU	Depleted Uranium
IBIS	Inflight Blade Inspection System
MC	Manual Chapter
RIC	Radioisotope Committee
TAR	Technical Assistance Request
USAF	United States Air Force