

PDR

30-L3024-

INSPECTION REPORT NO. 78-01Page 1 of

Attached

☐ Appendix A☐ Appendix B☐ Appendix C☐ Memo

J.G. Sylvester Assoc. Inc
900 Hingham Street
Rockland, Massachusetts

Licensee contact: Ken Baker - RSD Telephone no. 617-789-3250

License no. 80-17594-01 Last amendment and date: 001 8/16/77

Category: E, and Priority: 4, as of last amendment.

Inspection date(s): Sept 14, 15, 1978 Type of inspection: Routine

SUMMARY OF FINDINGS AND ACTION

☐ No noncompliance, clear 591 issued☒ Noncompliance, Appendix A☐ Action on previous noncompliance, Appendix B☐ Noncompliance, 591 issued☐ Regional action Hq action☐ Supplemental info, Appendix C

RECOMMENDATIONS

See basis in Appendix C or attached memo.

☐ Change Category to: ☐ Change Priority to: ☐ Next inspection date:

PERSONS CONTACTED

* B. Sylvester* K. Baker* P. Eaton * At ExitInspector: John BrownApproved: 9/15/789/20/78

A-1

Plan approved: _____ Date: _____

Licensee: _____

License no: _____

Inspection Items	Scheduled for inspection	Post-inspection status	Module no.	766 Time Info
Management meeting - Entrance and Exit Interviews (REQUIRED)	✓	Done	307038	1.0
Initial Management Meeting				
Program requirements, MC 28 <u>50</u> (REQUIRED)	✓	Done	777108	2.0
Licensee Event Followup			927008	
Followup on Inspector-identified problems			927018	
Followup on Noncompliance and Deviations			927028	
IE Bulletin/Immediate Action Letter Followup			927038	
Followup on Headquarters Requests			927048	
Followup on Regional Requests			927058	
Independent Inspection Effort (REQUIRED)	✓		927068	
Inspector Dispatched to Site			937008	
Followup on Significant Event Occurring During Inspection			937018	

AREAS INSPECTED AND FINDINGS

777108 - Industrial-Academic

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEMS	CRITERIA	FINDING
1. <u>Organization</u>	Lic Cond <u>12</u>	<u>U</u>
Management organization.		
Radiation protection organization.		

NOTES & REMARKS:

K Baker, acting as RSO - many duties delegated to D. Eaton

2. <u>Licensee internal audits</u>	Lic Cond <u>13</u>	<u>C</u>
Scope and frequency.		
Management controls.		

NOTES & REMARKS:

None by Sylvester or Baker last 6 months. Consultant (F. Clifford) on 5/2/78

3. <u>Training and instructions to employees</u>	Lic C	<u>C</u>
Training program, scope and frequency, retraining.	Lic Cond <u>13</u>	
Required tests administered; scores satisfactory.		
Instructions to workers.	19.12	

NOTES & REMARKS:

4. <u>Radiation protection procedures</u>		<u>C</u>
Operating & emergency procedures implemented.	Lic Cond <u>13</u>	
Security.	20.207	

NOTES & REMARKS:

AREAS INSPECTED AND FINDINGS

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEM	CRITERIA	FINDING
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5. Materials, facilities and instrumentsInf

Authorized uses and quantities. ✓

Lic Cond 6-9

Restricted areas, posting requirements. ✓

20.203

Survey instruments & dosimeters; operable, properly calibrated. ✓

Lic Cond 13Facilities NICLC 13

"Hoods" do not have entry ports described in AC & RP

6. Receipt and transfer of materialsC

Procedures implemented, adequate. ✓

20.205, 71.51

Transfer of byproduct material. ✓

30.41

Labeling and packaging. ✓

71.5, 49CFR 170-189

Records of receipt, transfer, storage, survey, and monitoring. ✓

30.51

NOTES & REMARKS:

7. Personnel protection - externalC

Personnel monitoring control; minimize exposures, control of accumulated dose. ✓

20.101, 20.102, 20.202

Surveys conducted, adequate. ✓

20.201

Records of monitoring, surveys, disposals. ✓

20.401, Lic Cond _____

Levels in unrestricted areas. ✓

20.1, 20.105

NOTES & REMARKS:

8. Personnel protection - internalC

Airborne concentrations in restricted areas. ✓

20.103

Exposure of minors. ✓

20.104

Posting of airborne radioactivity areas. ✓

20.203

Survey, monitoring requirements; records. ✓

20.201, 20.401

Leak tests of sealed sources. ✓

Lic Cond _____

NOTES & REMARKS:

Whole Body scans every 6 months. Material initially received March 1978. No scan as of 9/15/78.

AREAS INSPECTED AND FINDINGS

777103 - Industrial-Academic

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEM	CRITERIA	FINDING
9. <u>Effluent control, waste disposal</u>		<u>C</u>
Release of effluents. ✓	20.106	
Waste disposal. ✓	20.301, 20.303, 20.304, 20.305	
Procedures, records. ✓	20.401, Lic Cond _____	

NOTES & REMARKS:

10. <u>Shipping, shipping incidents</u>		<u>C</u>
Procedures for pickup, receipt, monitoring of packages. ✓	20.205(b) & (c)	
Transportation of licensed material. ✓	71.5	
Incidents, reports, corrective actions. ✓	49CFR 170-189	

NOTES & REMARKS:

11. <u>Notifications and reports</u>		<u>C</u>
To individuals. ✓	19.13	
Overexposures, excessive levels & concentrations, incidents. ✓	20.403, 20.405	
Personnel exposures and monitoring, termination reports. ✓	20.407, 20.408	
Theft or loss of licensed material. ✓	20.402	

NOTES & REMARKS:

None to report

12. <u>Posting of notices</u>		<u>N/I</u>
Part 20, license & documents, procedures, notice of violations. ✓	19.11(e)	
NRC-3. ✓	19.11(c)	

NOTES & REMARKS:

AREAS INSPECTED AND FINDINGS

777108 - Industrial-Academic

Licensee: _____ License no: _____ Amendment no: _____

INSPECTION ITEM	CRITERIA	FINDING
13. <u>Environmental monitoring program</u> Implementation of program, scope and frequency as required. Records maintained, reviewed by management. NOTES & REMARKS:	Lic Cond <u>None</u>	<u>NA</u>
14. <u>Emergency preparedness</u> Procedures available for incidents and accidents. Training for personnel; coordination with supporting groups and agencies. NOTES & REMARKS:	Lic Cond _____	<u>NA</u>
15. <u>Other license conditions</u> NOTES & REMARKS:	Lic _____	_____
16. <u>Confirmatory measurements</u> Licensee's surveys verified on sampling basis. NOTES & REMARKS:	20.105, 20.201	_____
17. <u>Independent inspection effort</u> NOTES & REMARKS:		_____

No use at time of inspection

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: _____

License no: _____

Reference

Basis for noncompliance

Report item 5

10 CFR _____

Lic Cond 13 app 6/3/77
attachmentType n/c InSection III-3 p2 of 3

On Sept 15, 1978 lab benches were
equipped with plexiglass panels
but no hinged portal door
had been provided to ~~be~~
permit manipulations without
sliding the whole panels

Report item _____

10 CFR _____

Lic Cond _____

Type n/c _____

Report item _____

10 CFR _____

Lic Cond _____

Type n/c _____

Report item _____

10 CFR _____

Lic Cond _____

Type n/c _____

Report item _____

10 CFR _____

Lic Cond _____

Type n/c _____

APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: _____ License no: _____

Identification and summary of action taken _____ Status _____

Report no: _____ Type n/c: _____ Describe: _____
Action taken: _____

None

OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____
Action taken: _____

OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____
Action taken: _____

OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____
Action taken: _____

OPEN
CLOSED

Report no: _____ Type n/c: _____ Describe: _____
Action taken: _____

OPEN
CLOSED

APPENDIX C - SUPPLEMENTARY INFO

Licensee: _____

License no: _____

- ☐ Uncorrected/repeated noncompliance
☐ Unusual occurrence, conditions, etc
☐ Basis for change of Category or Priority

- ☐ Unresolved items
☐ Inspector's comments

Hot lab is "home built" does not fit description in backup.

Benches are constructed of 2x4's and plywood and would not support much shielding. Enclosure consists of plexiglass panels which must be slid out of way to permit work to be done. Thus worker is facing opening 48" high right in front of his face while working.

NOV 15 1978

Docket Nos. 30-4577
30-13024

J. G. Sylvester Associates, Inc.
ATTN: Bruce J. Sylvester
President
900 Hingham Street
Rockland, Massachusetts 02370

Gentlemen:

Subject: Inspection 78-02 and 78-01

This refers to your letter dated October 13, 1978, in response to our letter dated September 26, 1978.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a subsequent inspection of your licensed program.

With respect to your answer to Paragraphs A and B, and your comments concerning Hot Laboratory Operations, you are advised that you are obligated to follow all of the statements, representations and procedures contained in the referenced documents incorporated as a condition of your license.

Section II, Item I of your "Administrative Control and Radiological Protection Procedures" defines the areas of responsibility of the President and the Assistant General Manager of J. G. Sylvester Associates, Inc. These responsibilities include "radiation protection," "maintenance of records" and "internal inspections of all operations to maintain continuing compliance with regulations and rules." Delegation of some of these responsibilities is permissible provided there is a management audit system to assure that they are carried out. The failure of the named officers to assure that their responsibilities regarding maintenance of records and internal audits were met constitutes non-compliance with Condition 16 of License No. 20-00302-02.

Section III-3 of your "Administrative Control and Radiological Protection Program for open Source Byproduct Materials" requires plexiglass panels on your laboratory benches. Use of licensed materials in this lab in

OFFICE ▶	FFMS <i>MS</i>	FFMS <i>live</i>	ATD <i>GLS</i>	DEP DIR <i>one</i>	DIRECTOR <i>16</i>
SURNAME ▶	McClintock/clc	Smith	Snyder	Allan	Grier
DATE ▶	11/8/78	11/13/78	11/13/78	11/14/78	11/14/78

A-2 7812110088 398

March of 1978, without the required plexiglass panels constitutes non-compliance with Condition 13 of License No. 20-17594-01, since it occurred prior to your receiving authorization from licensing to handle unsealed byproduct material without the panels.

With regard to your new procedures regarding hot laboratory operations, please be advised that all proposed changes to procedures, personnel or equipment that have been incorporated as conditions of your license must be submitted to the NRC's Radioisotope Licensing Branch for approval prior to your initiating the change.

Your cooperation with us is appreciated.

Sincerely,

Boyce H. Grier
Director

bcc:
IE Mail & Files (For Appropriate Distribution)
Central Files
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
REG:I Reading Room
Commonwealth of Massachusetts (2)

OFFICE ►

SURNAME ►

DATE ►

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OFFICE ▶						
SURNAME ▶						
DATE ▶						

J. G. SYLVESTER ASSOCIATES, INC.

METALLURGICAL AND WELDING CONSULTANTS
MATERIALS TESTING - METALLURGICAL LABORATORIES
INDUSTRIAL RADIOGRAPHY
FIELD INSPECTION

OFFICES AND LABORATORIES AT:
800 HINGHAM STREET
ROCKLAND, MASS. 02370

NDE

TELEPHONE
BOSTON 617-749-3290
ROCKLAND 617-878-9000
TWX 710-346-1793

October 13, 1978

U. S. Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Mr. Boyce H. Grier

Subject: Your letter concerning NRS Inspection 78-02 and 78-01

Dear Mr. Grier:

This will acknowledge receipt of the above referenced letter. We would now like to respond to Appendix A, Notice of Violation.

Your Paragraph A states that a radiography supervisor has been responsible for radiation protection and maintenance of records. In fact, this is not the case. Mr. Kenneth Baker of our organization, who is a designated officer of the company and named in our Administrative Control and Radiological Protection Procedure Rev. 6 October 14, 1975, was appointed our Radiation Safety Officer for industrial radiography operations upon the termination of Mr. Robert Smith, our former Radiation Safety Officer, on June 30, 1978. The radiography supervisor, Mr. Dennis Yeaton, has had the task of recording daily dosimeter checks and records of surveys, however the responsibility to see that these records are properly kept has been in the hands of Mr. Kenneth Baker. Mr. Baker has been reminded that the responsibility for these records are ultimately his own.

In regard to your second statement mentioning internal inspection of field site radiography, I would like to point out that there is no specific requirement under the regulations for these inspections nor is there a requirement in our Administrative Control and Radiological Protection Procedure. We therefore consider that there is no infraction for the conditions stated in your Paragraph A. We do agree, however, that this would be beneficial to our radiation safety program. We therefore have instituted a policy effective October 24, 1978 to have in-house and field spot checks of radiographic operations by our Radiation Safety Officer at a frequency of at least once in every two months period.

78-2116094

2PP

QUALITY ASSURANCE FOR INDUSTRY

Paragraph B

Revision 1 of our Administrative Control and Radiological Protection Program for Open Source By-Product Materials was submitted for approval earlier this year. An amendment to our license, Amendment #1 received several weeks ago, agreed to the revisions and new procedures were stipulated in that submittal. You will note if you read Revision 1 that the requirement for the hinged portal door is no longer required under our procedures. Naturally, we would use proper restraints and remote operating mechanism as described in Revision 1 for those open source by-product materials requiring this type of handling. Therefore, this is not considered an infraction.

Paragraph C

We acknowledge that records of the physical radiography surveys are erroneously omitted at the end of the shift on July 21, 1978 and July 24, 1978. This deficiency will be corrected by tightened surveillance by our Radiation Safety Office to insure that this documentation is properly made.

Hot Laboratory Operations

Please be advised that Mr. Frank Clifford has now been retained by this firm to act as our Radiation Safety Officer for our hot laboratory operations. All hot lab operations therefore will be conducted under the direct control and surveillance of Mr. Clifford with the following exceptions.

1. Materials may be received, surveyed and stored in our hot lab by the following persons.

Bruce Sylvester
Kenneth Baker
Dennis Yeaton

It shall be required, however, that these materials remain packaged and unopened until Mr. Clifford is physically on the premises, who can then supervise and control the opening, surveying and handling of these materials.

2. After these materials have been packaged for shipment and properly surveyed by Mr. Clifford they may be stored or shipped by Bruce Sylvester, Kenneth Baker or Dennis Yeaton without the direct supervision of Mr. Clifford.

Very truly yours,

J. G. SYLVESTER ASSOCIATES, INC.

Bruce J. Sylvester

Bruce J. Sylvester