

**digital logging, inc.**

9810 A East 58th Street  
Tulsa, Oklahoma 74146  
(918) 252-5416

AUG 30 1985

August 30, 1985

U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Attn: Mr. R. E. Hall, Chief  
Radiological and Safeguards Programs Branch

Re: NRC License No. 35-19815-01  
Docket No.: 30-19278/85-01

Gentlemen:

We are in receipt of your letter dated August 5, 1985 and the enclosed Notice of Violation which resulted from an inspection on July 16, 1985 by Mr. L. Ricketson of your office. We take issue with most of the cited violations, due to the fact that the inspection was unannounced and the personnel who administer the radiation files were not available to assist the inspector in locating these specific items. We respond to the items on the Notice of Violation as follows:

- A. This is not a violation. These sources were tested for leakage and we enclose copies of the leak test results herewith. Apparently these were not in the proper file at the time of the inspection.
- B. This is not a violation. We do not post a copy of the operating procedures, however, we have posted on the bulletin board a card stating where the radiation records including the operating procedures are located. I cannot explain why the inspector could not find a copy of the operating procedures, as the manual is now in the files. We have made a duplicate and placed in the files so that if a copy is removed for review by an employee, there will still be a copy in the file.
- C. This is not a violation. Mr. Arndt has been provided personnel monitoring since his employment and we enclose a dosimetry report with his exposure record outlined.

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REG4 LIC30  
35-19815-01 PDR


IC-126/85

- D. We have read the DOT regulations requiring each shipper to maintain certification of sources to meet special form requirements. It is difficult to determine just what is expected of us as a shipper. It is the responsibility of the source manufacturer to perform tests and certify the material as special form. We do keep copies of all papers sent to us by the manufacturer, even for sources we have transferred. Apparently this is not adequate, so we will write to the manufacturer and obtain a certification for each source model which we purchase, possess, and/or transfer.
- E. We do make physical inventories every six months when the leak test wipes are performed. Apparently records of these inventories were not in the proper file at the time of the inspection. Enclosed are copies of the inventories which we found, being May 1984, November 1984, and May 1985. This leaves November 1983 missing. Future inventories will be kept for review by your inspector.

Conclusion: We feel these alleged violations reflect the problems brought about by unannounced inspections. Digital Logging, Inc. does not have a history of health physics violations and unannounced inspections simply waste our time and yours. We would appreciate in the future at least 24 hours notice so that we could have proper personnel available to assist the inspector, otherwise, we will allow the inspector to make his radiation measurements, interviews, observations, etc., but request postponement of the records audit until proper personnel are available. Considering the statements herein, the corrective steps taken and proposals to prevent future violations, we feel that we are in full compliance as of this date.

Sincerely,

DIGITAL LOGGING, INC.



Bennie E. Holt

cc: Keith Moon - SC&A Inc.  
S. W. Hoffman

## RADIATION SOURCE INVENTORY

GREAT GUNS, INC.

STATION DIGITAL LOGGINGDATE MAY, 1984

ISOTOPE	STRENGTH	SERIAL NUMBER	UTILIZATION
AmBe 241	3 curie	71-1-361G	
AmBe 241	3 curie	71-1-487G	
AmBe 241	200 millicurie	71-1-571B	
AmBe 241	200 millicurie	71-1-442B	
Cs 137	2 curie	CSV 419A	
Cs 137	2 curie	CSV 250	
Cs 137	2 curie	CSV 587	
Cs 137	2 curie	CSV 268	
Cs 137	2 curie	CSV 720	
Cs 137	2 curie	CSV 678	
Cs 137	2 curie	CSV 719	
Cs 137	2 curie	CSV A68	
Cs 137	2 curie	CSV A67	
AmBe 241	5 curie	71-1-608B	
AmBe 241	20 curie	71-2A-757B	

These sources were stored at Digital on the dates indicated, when the wipe tests were made.

*L W Hoffman*

*R.P.C. Great Guns Logging*

Station Manager

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## RADIATION SOURCE INVENTORY

GREAT GUNS, INC.

STATION DIGITAL LOGGINGDATE NOV., 1984

ISOTOPE	STRENGTH	SERIAL NUMBER	UTILIZATION
AmBe 241	20 curie	71-2A-632B	
AmBe 241	20 curie	71-2A-757B	
AmBe 241	5 curie	71-1-608B	
AmBe 241	3 curie	71-1-361G	
AmBe 241	3 curie	71-1-487G	
AmBe 241	200 millicurie	71-1-571B	
AmBe 241	200 millicurie	71-1-442B	
Cs 137	2 curie	CSV 419A	
Cs 137	2 curie	CSV 587	
Cs 137	2 curie	CSV 268	
Cs 137	2 curie	CSV 720	
Cs 137	2 curie	CSV 678	
Cs 137	2 curie	CSV 719	
Cs 137-	2 curie	CSV A68	

These sources were stored at Digital on the dates indicated, when the wipe tests were made.

*L. W. Hoffman*

*R. P. O. Great Guns Logging*

Station Manager

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## RADIATION SOURCE INVENTORY

GREAT GUNS, INC.

STATION DIGITAL LOGGINGDATE MAY 1st, 1985

ISOTOPE	STRENGTH	SERIAL NUMBER	UTILIZATION
AmBe 241	5 curie	71-1-608B	
AmBe 241	3 curie	71-1-487G	
AmBe 241	3 curie	71-1-361G	
AmBe 241	200 millicurie	71-1-571B	
AmBe 241	200 millicurie	71-1-442B	
Cs 137	2 curie	CSV A68	
Cs 137	2 curie	CSV 719	
Cs 137	2 curie	CSV 720	
Cs 137	2 curie	CSV 678	
Cs 137	2 curie	CSV 587	
Cs 137	2 curie	CSV 268	

These sources were stored at Digital on the dates indicated, when the wipe tests were made.

*LW Hoffman*

*R.P.O. Great Guns Logging*

Station Manager

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LOGGING INC  
 IF HOLT  
 58TH ST  
 CK 74146

ACCOUNT NO 40931	SERIES CODE
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PROCESS NO 00001	REPORT DATE 6/2/35	DOSIMETER RECEIVED	REPORTING TIME IN WORK DAYS	PAGE NO 1
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QUALITY CONTROL RELEASE PQR
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## DOSIMETRY REPORT

1 - PF 3164 - 40001

NAME	SOCIAL SECURITY NUMBER	NOTE (SEE REVERSE SIDE) DOSIMETER TYPE	USE	RADIATION QUALITY	EXPOSURE TO BADGE (MILLIREMS) FOR PERIOD(S) INDICATED BELOW		CUMULATIVE TOTALS (MILLIREMS)						ADJUSTMENTS	UNUSED PART OF PERMISSIBLE ACCUMULATED DOSE (MILLIREMS)	BIRTH DATE			NUMBER BADGE REPORTS		INCEPTION DATE OF PERMA- NENT TOTAL										
							CALENDAR QUARTER		YEAR TO DATE		PERMANENT				SEX	MO	DA	YR	TO DATE	QTR	MO	YR								
					DEEP	SHALLOW	DEEP	SHALLOW	DEEP	SHALLOW	DEEP	SHALLOW																		
DAYE ARTHUR	5455891790					660	660								790	790	F	M	9	2	953	2								

2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21

SPRINT Wrist  
 OTHER EXTREMITY  
 & OTHER WHOLE BODY

AN "H" (HIGH ENERGY) DESIGNATION WHEN ONLY LOW ENERGY  
 EXPOSURE IS INDICATED MAY INDICATE THAT THE FILM PALLET

REPORT MADE BY: R. S. LANDAUER, JR. & CO. 1000 N. GLENVIEW AVE. GLENVIEW, ILL. 60025

Digital

# SEALED SOURCE LEAK TEST CERTIFICATE

July 13, 1983

License Number 35-19213-01

Pursuant to the conditions for your by-product or special nuclear material license issued by the Board of Health and Environment of the State of Kansas or the United States Nuclear Regulatory Commission, a leak test has been performed on the sources listed in items 4, 5, and 6 below and this report satisfies the conditions of the referenced license and regulations.

1. Authorized User - Great Guns, Inc. (Bill Hoffman)

2. Vickers-KSB&T Building

3. Wichita, Ks 67201

4. Am-241,Be

5. 200 mCi

6. Sr. No. 5718

7. Results of this test indicate the source to have less than 0.005 microcuries (0.05 microcuries if applicable) of removable contamination.

8. The equipment used for this test:

survey of swipes - Victoreen Model 491 with a 491-30 geiger counter for gamma-electron and Victoreen 488A neutron survey instrument.

pulse height analysis - TN-1705 1024 channel analyser.

Test performed by: *Paul D. Pitzer*  
License Number 33-C502-01 *Chris Neen*

Date: 7/13/83

*Tulsa*

SEALED SOURCE LEAK TEST CERTIFICATE

December 05, 1983

License Number 35-19213-01

Pursuant to the conditions for your by-product or special nuclear material license issued by the Board of Health and Environment of the State of Kansas or the United States Nuclear Regulatory Commission, a leak test has been performed on the sources listed in items 4, 5, and 6 below and this report satisfies the conditions of the referenced license and regulations.

1. Authorized User - Great Guns, Inc. (Bill Hoffman)
2. Vickers-KSB&I Building
3. Wichita, Kansas 67201
4. Am-241 - Be      5. 200 mCi      6. Sr. No. 71-1-571B

7. Results of this test indicate the sources to have less than 0.005 microcuries (0.05 microcuries if applicable) of removable contamination.

8. The equipment used for this test:

survey of swipes - Victoreen Model 491 with a 491-30 geiger counter for gamma-electron.

pulse height analysis - IN-1705 1024 channel analyser

Test performed by:

*David William Sitzer*  
*Chris Hearn*

Date: 12/08/83

License Number 33-C502-01



*Tulsa*

SEALED SOURCE LEAK TEST CERTIFICATE

May 10, 1984

License Number 35-19213-01

Pursuant to the conditions for your by-product or special nuclear material license issued by the Board of Health and Environment of the State of Kansas, a leak test has been performed on the sources listed in items 4, 5, and 6 below and this report satisfies the conditions of the referenced license and regulations.

1. Authorized User - Great Guns, Inc. (Bill Hoffman)
2. Vickers-KSB&T Building
3. Wichita, Kansas 67201
4. Am-241, Be      5. 200 millicuries      6. Sr.No. 71-1-571B

7. Results of this test indicate the source to have less than 0.005 microcuries (0.05 microcuries if applicable) of removable contamination.

8. The equipment used for this test:

survey of swipes - Victoreen Model 491 with a 491-30 geiger counter for gamma-electron and Victoreen 488A neutron survey instrument.

pulse height analysis - TN-1705 1024 channel analyser

Test performed by: *David William Rife* Date: 5/12/1984

*Chris Elearn*  
License Number 33-C502-01

TU/50

SEALED SOURCE LEAK TEST CERTIFICATE

October 30, 1984

License Number 35-19213-01

Pursuant to the conditions for your by-product or special nuclear material license issued by the United States Nuclear Regulatory Commission, the Board of Health and Environment of the State of Kansas, or other agreement state, a leak test has been performed on the source specified below and this report satisfies the conditions of the referenced license and regulations.

1. Authorized User - Great Guns, Inc. (Bill Hoffman)

2. Suite 1120, KSB Building, 125 N. Market

3. Wichita, Kansas 67202

4. Source Material - Am-241, Be  
Activity - 200 mCi  
Serial Number - 71-1-571B

5. Results of this test indicate the source to have less than 0.005 microcuries (0.05 microcuries if applicable) of removable contamination.

6. The equipment used for this test:

survey of swipes - Victoreen Model 491 with a 491-30 geiger counter for gamma-electron and Victoreen 488A neutron survey instrument.

pulse height analysis - TN-1705 1024 channel analyser.

Test performed by: *David William Suter*  
*Chris Hearn* Date: 10/30/84  
License Number 33-C502-01

Tulsa

# SEALED SOURCE LEAK TEST CERTIFICATE

April 30, 1985

License Number 35-19213-01

Pursuant to the conditions for your by-product or special nuclear material license issued by the United States Nuclear Regulatory Commission, the Board of Health and Environment of the State of Kansas, or other agreement state, a leak test has been performed on the source specified below and this report satisfies the conditions of the referenced license and regulations.

1. Authorized User - Great Guns, Inc. (Bill Hoffman)

2. Suite 1120, KSB Building, 125 North Market

3. Wichita, Kansas 67202

4. Source Material - Am-241, Be  
Activity - 200 mCi  
Serial Number - 71-1-571B

5. Results of this test indicate the source to have less than 0.005 microcuries (0.05 microcuries if applicable) of removable contamination.

6. The equipment used for this test:

survey of swipes - Victoreen Model 491 with a 491-30 geiger counter for gamma-electron and Victoreen 488A neutron survey instrument.

pulse height analysis - TN-1705 1024 channel analyser.

Test performed by:

License Number 33-C502-01

Date: 4/30/85