



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

January 3, 2012

Robert Compernelle, President
FMRI, Inc.
Number 10 Tantalum Place
Muskogee, Oklahoma 74403

SUBJECT: NRC INSPECTION REPORT 040-07580/11-002 AND NOTICE OF VIOLATION

Dear Mr. Compernelle:

This letter refers to the inspection conducted on November 3-4, 2011, at your facility located in Muskogee, Oklahoma. During this inspection, the NRC staff examined activities conducted under your license as they relate to public health and safety to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. A preliminary exit briefing was presented at the end of the onsite inspection, and a final exit briefing was conducted with members of your staff by telephone on January 3, 2012. The enclosed report presents the results of this inspection.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involves your failure to achieve the minimal detectable activity for lapel air samplers, as required by your license. This violation was evaluated in accordance with the NRC Enforcement Policy included on the NRC's Web site at www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited to ensure that you provide us with the corrective actions necessary to resolve the technical concerns and to prevent recurrence of the violation.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," is enclosed. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Should you have any questions concerning this inspection, please contact Mr. Robert Evans at (817) 860-8234 or the undersigned at (817) 860-8191.

Sincerely,

/RA Charles L. Cain for/

D. Blair Spitzberg, PhD, Chief
Repository and Spent Fuel Safety Branch

Docket: 040-07580
License: SMB-911

Enclosures:

1. Notice of Violation
2. NRC Inspection Report 040-07580/11-002
3. NRC Information Notice 96-28

cc w/enclosures 1 & 2:
Curtis J. Zamec
President and Chief Executive Officer
Fansteel, Inc.
1746 Commerce Road
Creston, Iowa 50801

Greg Marshall
President
Green Lantern Acquisition 1, LLC
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J. Gregory Buckley
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bcc w/enclosures 1 & 2 (via e-mail):
 Roy Caniano, Director, DNMS
 Vivian Campbell, Deputy Director, DNMS
 Chuck Cain, Senior Materials Analyst, DNMS
 D. Blair Spitzberg, Chief, RSFS
 James Shepherd, FSME/DWMEP/DURLD
 Robert Evans, RSFS
 Gerald Schlapper, RSFS
 Linda Gersey, RSFS
 Marisa Herrera, Fee Coordinator

DRAFT: S:\DNMS\INMSB-B\RJE\FMRI Inspection Report 11-002.doc
 FINAL: R:\ DNMS **ML**

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|-----------------|--|---|---|------------------------|
| ADAMS | <input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes | <input checked="" type="checkbox"/> SUNSI Review Complete | Reviewer Initials: RJE |
| Category | <input checked="" type="checkbox"/> Publicly Available | | <input checked="" type="checkbox"/> Non-sensitive | |
| Category | <input type="checkbox"/> Non-publicly Available | | <input type="checkbox"/> Sensitive | |
| KEYWORD: | | | Sensitive - | |
| RIV:DNMS:RSFS | RSFS | C:RSFS | | |
| RJEvans | LMGersey | DBSpitzberg | | |
| /RA/ | /RA/ | /RA/ | | |
| 12/27/11 | 12/27/11 | 12/27/11 | | |

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax

NOTICE OF VIOLATION

FMRI
Muskogee, Oklahoma

Docket: 040-07580
License: SMB-911

During an NRC inspection conducted on November 3-4, 2011, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 10 states, in part, that activities related to decommissioning will be conducted in accordance with statements, representations, and conditions contained in the application as supplemented by letter dated July 24, 2003. Letter dated July 24, 2003, Attachment 4 entitled, "Proposed Part B", Section 3.5.1 states, in part, that the minimal detectable activity for air sampling will be 2.37 E-13 microcuries of uranium per milliliter of air.

Contrary to the above, on November 3, 2011, the NRC inspectors determined that the licensee was unable to meet the minimal detectable activity of 2.37 E-13 microcuries of uranium per milliliter of air when using lapel air samplers. Specifically, the licensee was only able to detect a minimum of 1E-12 microcuries of uranium per milliliter of air.

This is a Severity Level IV violation (Section 6.7).

Pursuant to the provisions of 10 CFR 2.201, FMRI, is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time. If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in

detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days.

Dated this 3rd day of January 2012

**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket: 040-07580

License: SMB-911

Report: 040-07580/11-002

Licensee: FMRI, Inc.

Facility: Muskogee Plant

Location: Muskogee, Oklahoma

Date: November 3-4, 2011

Inspectors: Robert Evans, PE, CHP, Senior Health Physicist
Repository and Spent Fuel Safety Branch

Linda M. Gersey, Health Physicist
Repository and Spent Fuel Safety Branch

Approved By: D. Blair Spitzberg, PhD, Chief
Repository and Spent Fuel Safety Branch

Attachment: Supplemental Inspection Information

EXECUTIVE SUMMARY

FMRI, Inc.
NRC Inspection Report 040-07580/11-002

This inspection was a routine, announced inspection of decommissioning activities in progress at the FMRI facility in Muskogee, Oklahoma. In summary, the licensee was conducting decommissioning in accordance with license requirements, with one exception described below.

Onsite Construction

- The licensee was conducting Phase I decommissioning activities in accordance with work plan requirements (Section 1.2.a).
- The licensee was storing bagged waste materials in the onsite staging area in accordance with license requirements (Section 1.2.b).
- The inspectors reviewed the licensee's previous accounting of sales from surplus equipment, but the inspectors were unable to close an NRC Unresolved Item about the licensee's accounting requirements pending additional discussions with NRC headquarters staff (Section 1.2.c).

Radiation Protection

- The licensee implemented a radiation protection program during site decommissioning in compliance with 10 CFR Part 20 and the license, with one exception. One violation was identified related to the licensee's failure to achieve the minimal detectable activity for lapel air sampling as required by the license (Section 2.2.a).
- The licensee experienced a municipal water leak inside of the radiologically restricted area, and the inspectors confirmed that the event was not reportable to the NRC (Section 2.2.b).
- One previously identified violation was closed involving the licensee's failure to ensure that removable contamination on all equipment being released from the site was below the limit specified in the license (Section 2.2.c).

REPORTS DETAILS

Summary of Site Status

At the time of the inspection, the licensee was conducting Phase 1 decommissioning in accordance with the NRC-approved Decommissioning Plan dated January 14, 2003. Phase 1 decommissioning includes removal of work-in-progress (WIP) residue material from Ponds 2 and 3 and transfer of this material to an out-of-state uranium mill for use as alternate feed material.

The licensee commenced with Phase 1 work during 2005. The licensee started by removing, bagging, and shipping WIP material from Pond 3. The licensee completed the removal of WIP material from Pond 3 during 2010. The licensee then reshaped the slopes of Pond 3 for erosion control. Since the previous inspection, the licensee removed and packaged all remaining Pond 3 material being stored in the onsite drying bed, and the licensee reshaped the drying bed for erosion control.

After an extended delay, the licensee resumed Phase I work on July 18, 2011. The initial work activities included bagging of wastes removed from Ponds 2 and 3. These bagged wastes included trash, debris, and liner material. The bags were placed inside a building for protection from the elements while in storage. The licensee plans to permanently dispose of these wastes at an out-of-state disposal facility at a later date.

The licensee started removing WIP material from Pond 2 on August 29, 2011. At the time of the inspection, the licensee was approximately 25-percent complete with this work activity. The licensee was bagging the WIP material in super-sacks. The super-sacks were being staged in an onsite storage area in accordance with the license. The licensee plans to ship the bags to a uranium mill located in Utah during the Spring or Summer of 2012 for use as alternate feed material.

Following the completion of Phase 1 work, the licensee plans to begin decommissioning of Ponds 6 and 7. In the next few months, the licensee plans to prepare for and to conduct radiological surveys of the northeastern and southwestern portions of the property. The licensee plans to conduct the work using the instructions provided in the final status survey plan submitted to the NRC by letter dated February 25, 2011. The licensee plans to use the results of these surveys in future requests to free-release these properties from the license.

By letter dated June 21, 2011, the licensee requested NRC approval for consent for indirect change of control of the license from Fansteel to Green Lantern Acquisition 1. The licensee also submitted a second letter dated June 21, 2011, requesting modification of the license to support the proposed change in ownership. At the time of this inspection, the NRC had not completed its review of these license amendment requests.

1 Onsite Construction (88001)

1.1 Inspection Scope

The inspectors conducted a review of onsite handling and storage of radioactive wastes to ensure compliance with license requirements.

1.2 Observations and Findings

a. Reclamation of Pond 2

Pond 2 was placed into service during 1960 and was permanently removed from service during 1979. The pond was originally designed to be 350-feet long, 150-feet wide, and 12-feet deep. The pond's actual dimensions are slightly less than the design dimensions. This clay-lined pond was capped with a polyvinyl chloride sheet and was covered with 6-36 inches of soil to support vegetation. The licensee originally estimated that this pond contained about 7800 tons of WIP material, although the actual amount of WIP material will probably be less than this estimated amount.

The licensee commenced with decommissioning of Pond 2 on August 29, 2011. At the time of the inspection, the licensee was about 25-percent complete with reclamation of Pond 2. The licensee had excavated and staged about 500 super-sacks of WIP material from Pond 2. The WIP material was dry enough to be placed directly into the super-sacks. The bagged WIP material was staged in an onsite storage area located near the former sodium reduction building.

License Condition 52 states, in part, that the licensee shall have an up-to-date work plan prior to the beginning of each stage of decommissioning. The inspectors compared the work being performed in Pond 2 to the instructions provided in the Phase I Implementation Work Plan dated July 2007. The inspectors concluded that the plan provided sufficient details for the Pond 2 decommissioning work. The inspectors also concluded that the licensee was conducting the pond excavation and bagging work in accordance with the work plan.

At the time of the inspection, the licensee had not finalized its plans for shipment of the remaining WIP material to a uranium mill in Utah for use as alternate feed material. The licensee expects to begin shipping this material to the mill during mid-2012. The licensee is expected to update the transportation plan prior to shipment of the WIP material. The updated transportation plan and the licensee's shipping activities will be reviewed during a future inspection.

b. Storage of Contaminated WIP Material, Wastes and Soil

The inspectors reviewed the licensee's storage of radioactive material at the site. At the time of the inspection, the licensee had 226 bags of debris stored in the sodium reduction building, 339 bags of WIP material stored in the thermite building, and approximately 1100 bags of WIP material staged in the outdoor storage area. The staged WIP material included material excavated from both Ponds 2 and 3.

The licensee continues to store contaminated soils in the sodium reduction building. The licensee estimated that approximately 2000 tons of contaminated soil remains in storage. This soil originated from previous reclamation work involving Ponds 1N, 1S, and 5. The licensee also continued to store about 7000 cubic yards of potentially contaminated soil recovered during construction of the intercept trench. This material was stored onsite under sheets of plastic. Further, the licensee continued to store approximately 68,000 dry tons of calcium fluoride material in Ponds 8 and 9. These various materials will be relocated, packaged, shipped, transferred and/or disposed during future decommissioning activities.

The inspectors reviewed the licensee's staging of WIP material in the outdoor storage area. License Condition 25 provides the outdoor storage requirements. This license condition provides restrictions for number of lifts, cover material, base material, inspections, and storm water runoff. The inspectors compared the licensee's actual staging operations to the license requirements, and the inspectors concluded that the licensee was staging the WIP material in accordance with the license requirements.

The licensee started using the outdoor storage area during mid-September 2011. As allowed by the license, the licensee can stage material at this location without an enhanced cover for up to one year. As noted above, the licensee plans to commence with shipment of the WIP material during mid-2012. However, if the licensee has not completed the removal of staged material within one year, the licensee is required to install an enhanced cover over the staged material.

- c. (Discussed) Unresolved Item 040-07580/1101-02: Reporting of surplus equipment sales to NRC and transfer of these monies to the standby trust

During the previous inspection, the NRC staff identified one Unresolved Item involving the licensee's accounting of scrap material and equipment sales. Specifically, the inspectors were unable to determine if the licensee was required to report the sale of scrap metal and equipment to the NRC in accordance with License Condition 44. In addition, the inspectors were unable to determine if the licensee was required to transfer these assets to the decommissioning trust fund as required by License Condition 10. These financial issues were briefly reviewed during the inspection, but further discussions are required with NRC headquarters staff before the inspectors could resolve these financial issues. This Unresolved Item will be reviewed during a future inspection.

1.3 Conclusions

The licensee was conducting Phase I decommissioning activities in accordance with work plan requirements. The licensee was storing bagged waste materials in the onsite staging area in accordance with license requirements. The inspectors reviewed the licensee's previous accounting of sales from surplus equipment, but the inspectors were unable to close an NRC Unresolved Item about the licensee's accounting requirements pending additional discussions with NRC headquarters staff.

2 Radiation Protection (83822)

2.1 Inspection Scope

The inspectors reviewed the licensee's implementation of its radiation protection program to ensure compliance with 10 CFR Part 20 requirements and the license.

2.2 Observations and Findings

- a. Radiation Protection Controls During Pond 2 Reclamation

The licensee used a contract radiation safety officer (RSO) to oversee the radiation safety program. The RSO was on-site a minimum of one week per month. The licensee

also used contract health physics staff to perform radiation safety work associated with the reclamation of Pond 2 and for other routine duties. The health physics supervisor was responsible for the day-to-day work activities. The contract workers followed the site-specific radiation safety program, as outlined in the licensee's decommissioning plan. When radiation safety procedures were not available, special work permits were used to supply specific radiological and industrial safety requirements.

One violation (VIO 040-07580/1102-01) was identified related to the licensee's committed minimal detectable activity (MDA) limit for air samplers. In its letter dated July 24, 2003, referenced in License Condition 10, the licensee committed to an MDA for air samplers of $2.37 \text{ E-}13$ microcuries of uranium per milliliter of air ($\mu\text{Ci/ml}$). Air samplers are used as the primary source of determining occupational doses. Due to the limited amount of air flow, lapel air samplers are not able to detect uranium at the license-specified MDA level. The licensee stated they could not detect below $1\text{E-}12$ $\mu\text{Ci/ml}$ using lapel air samplers.

The inspectors noted that the licensee had isotopic analysis performed on the Pond 2 and Pond 3 material to determine a site specific derived air concentration (DAC), as allowed by 10 CFR 20.1204(e). The licensee assigns workers DAC-hours from air sampling results. Since thorium-232 was the greatest radiological hazard for site operations, air sampling is the only means of determining occupational exposure. At the time of the inspection, the highest assigned occupational dose assigned to a worker was 2.5 DAC-hrs. The inspectors noted that this was below the occupational dose limit of 2000 DAC-hrs per year. The licensee also used respirators when appropriate and assigned the correct protection factors in accordance to 10 CFR Part 20, Appendix A.

The inspectors reviewed the results of routine radiological surveys and surveys performed during Pond 2 reclamation. Routine surveys were conducted weekly and bi-weekly, as required by the licensee's procedures and license requirements. Before the release of any equipment, the licensee performed alpha/beta removable wipe and fixed contamination surveys and gamma exposure surveys. Release surveys were conducted in accordance with License Condition 33.

The inspectors reviewed the licensee's radiation safety training for contractors and employees. Training consisted of lectures, one-on-one discussions, and self-reviews. Respirator training for nine contractors was completed in July/August of 2011. The inspectors confirmed the licensee had completed the appropriate medical releases, training, and fit testing for individuals wearing respirators.

The licensee had sufficient instrumentation available to perform contamination and ambient area surveys. All instruments were calibrated within the past twelve months. The inspectors observed the respirators in use and found them to be in good condition.

b. Potable Water Spill

On October 31, 2011, the licensee experienced a potable water spill inside of the radiologically restricted area. A 6-inch underground water line located adjacent to the Chem A building ruptured, resulting in the leakage of municipal water into the yard around the Chem A building. The licensee discovered the leak the next morning and immediately terminated the leak. The licensee estimated that approximately one million gallons of municipal water spilled within the restricted area during the event.

The licensee investigated the cause of the leak. The leak originated below a concrete slab, and the licensee had to remove several sections of concrete to identify the source of the leak. The leak was caused by the failure of a compression fitting in the cast-iron water supply piping. The piping was the original water line that was installed concurrently with building construction during 1958. Due to the depth of the line and the thickness of the concrete slab, the fitting failure was not attributed to heavy equipment being operated in the area of the water supply line.

At the time of the leak, the wastewater treatment system was out of service; therefore, none of the spilled fluid entered the system, which discharges to the onsite ponds. However, the leak entered the "boneyard," the area where the licensee stored potentially radioactive trash. The water filled the boneyard area, came into contact with potentially contaminated soil and equipment, and spilled over the concrete wall surrounding the boneyard. The water then traveled to the edge of the property and flowed into the Arkansas River. The spill created a washed-out area at the edge of the property, just beyond the intercept trench, and damaged the perimeter fence. In the near future, the licensee plans to repair the washed-out area using cinder blocks and soil.

The inspectors conducted a follow up review of the licensee's response to the leak. In particular, the inspectors attempted to determine if the leak had impacted the operability of the intercept trench, because the washed-out area was located within about 10 feet of the trench. The licensee's representative stated that the trench was most likely not impacted for two reasons. First, the outer wall of the trench includes a back-side liner, and the liner was not visible in the washed-out area. This observation suggests that the outer edge of the trench was not breached by the wash-out. Second, the licensee noted that the flow rates in the trench were normal, suggesting that the trench was still functioning as designed.

The inspectors reviewed the event for reportability. The licensee verbally notified the State of Oklahoma, although the licensee's state discharge permit does not specify whether this type of event was required to be reported. The licensee did not notify the NRC; although, the event did not appear to meet the NRC's reportability requirements as specified in 10 CFR Parts 20 and 40. However, the inspectors noted that the licensee did not sample the water for radioactive contamination at any time during the event. The licensee's representative stated that its early focus was termination of the leak and cleanup of standing water. The licensee did not believe that sampling was necessary because the source of the water was municipal water. Although the water was non-impacted municipal water, the water traversed through the licensee's radiologically restricted area. By not sampling the water, the licensee was unable to clearly determine how much radioactivity was released, if any, to the environment as a result of this unmonitored release.

- c. (Closed) Violation 040-07580/1101-01: Failure to ensure that all equipment released from the site met the contamination limits specified in the license

During the previous inspection, one violation was identified related to the licensee's failure to perform swipe samples on released equipment to verify compliance with the removable release limit specified in the license. The licensee responded to the violation in letter dated September 30, 2011. The licensee stated that they would implement wipe surveys for all equipment released from the site. The inspectors reviewed the release

records for equipment and found the licensee had performed the surveys. This violation is considered closed.

2.3 Conclusions

The licensee implemented a radiation protection program during site decommissioning in compliance with 10 CFR Part 20 and the license, with one exception. One violation was identified related to the licensee's failure to achieve the minimal detectable activity for lapel air sampling as required by the license. The licensee experienced a municipal water leak inside of the radiologically restricted area, and the inspectors confirmed that the event was not reportable to the NRC. One previously identified violation was closed involving the licensee's failure to ensure that removable contamination on all equipment being released from the site was below the limit specified in the license.

3 **Exit Meeting**

The inspectors reviewed the scope and findings of the inspection during the preliminary exit meeting conducted at the conclusion of the onsite inspection on November 4, 2011. The final exit meeting was conducted telephonically on January 3, 2012. The licensee did not identify as proprietary any information provided to, or reviewed, by the inspectors.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Burgess, Operations Manager
G. Marshall, Consultant, Premium Environmental Services
B. Thomas, Radiation Safety Officer

INSPECTION PROCEDURES USED

IP 83822 Radiation Protection
IP 88001 Onsite Construction

ITEMS OPENED, CLOSED, AND DISCUSSED

Open

040-07580/1102-01 VIO Failure to achieve minimal detectable activity when using lapel air samplers

Closed

040-07580/1101-01 VIO Failure to ensure that all equipment released from the site met the contamination limits specified in the license

Discussed

040-07580/1101-02 URI Reporting of surplus equipment sales to NRC and transfer of these monies to standby trust

LIST OF ACRONYMS AND ABBREVIATIONS USED

| | |
|--------|-----------------------------|
| CFR | Code of Federal Regulations |
| DAC | derived air concentration |
| IP | Inspection Procedure |
| µCi/ml | microcurie per milliliter |
| RSO | Radiation Safety Officer |
| URI | Unresolved Item |
| VIO | violation |
| WIP | work-in-progress |