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Kathy Dolce Modes, Health Physicist
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Rd
King of Prussia, PA 19406-1415

January 9, 2003

Subject: Supplemental Response to Confirmatory Action Letter No. 1-02-004.
RE: NY License No. 2930-4164

RECEIVED
REGION 1
JAN 13 PM 2:32

Dear Ms. Modes:

- Item 2

Due to parking restraints at the Ossining Facility and the home location of TLI radiographers, the mobile radiography vehicles are parked at the Woodbridge, NJ facility most of the time. When radiography is scheduled, the vehicle is driven to Ossining, NY, the exposure device is placed in the transport container and after the radiography is completed the exposure device is returned to Ossining, NY and the vehicle is returned to Woodbridge, NJ.

It is standard industry practice to keep associated equipment on the mobile radiography vehicles. The reason is you are not concerned that any safety equipment was left behind when you arrive at the job-site. Radiography cannot be performed with associated equipment alone and the prospect of arriving at a job-site without a collimator, guide tube, or control cable is a definite possibility. TLI believes that to require removal of all associated equipment from vehicles or that vehicles be parked in Ossining, NY is an unnecessary burden. Granting relief from that requirement would not compromise the NRC's position that no radiography be performed in its' jurisdiction.

- Item 3

All radiography personnel currently employed have been re-trained on radiographic operations, specifically the responsibility of radiographers to supervision radiographer's assistants. By signing the document, the individuals acknowledged their understanding of and their agreement to abide by the requirements. (Copies of the training documentation enclosed)

All radiography personnel were audited in the field on December 15, 2002 and no deficiency in the area of supervision of radiographer's assistants was observed. (Copy of audit enclosed)

The responsibility of radiographers to supervise radiographer's assistants will be emphasized in the initial training for new employees and be incorporated in the periodic training for 2003.

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01/08/03
US NRC
Response to Confirmatory Action Letter No. 1-02-004.

- Associated Item A

Information requested regarding September 2001 badge reading for radiographer's assistant, enclose as follows.

- 11/16/01 – Internal memo documenting investigation of events by RSO and conclusion.
- 01/15/02 – Informational memo distributed to radiography personnel to re-emphasize importance of proper badge storage when not performing radiography.
- 05/15/02 – Hand written letter from radiographer's assistant detailing events that caused the elevated badge reading.

Employee letter was not generated until requested by NYS DOL auditor, in an attempt to have badge vendor remove erroneous reading from employee's radiation history.

Respectfully Submitted,


Bruce Ballard, RSO

cc: V. Reddy Kancharla, President
Nagesh Geol, Director of NDT

TESTWELL LABORATORIES, INC.

SPECIFIC TRAINING DOCUMENTATION - 2002

REFERENCE

NRC REGION CONFIRMATORY ACTION LETTER

Retraining of all radiographic personnel BY October 15, 2002.

SUBJECT

Supervision of Radiographer's Assistants During Radiography.

1. The radiographer's physical presence at the site...;
2. The availability of the radiographer to give immediate assistance...; and
3. The radiographer's direct observation of the assistant's performance...

EMPLOYEES

Mr. [REDACTED] F. [REDACTED]
Ms. [REDACTED]-S. [REDACTED] A. [REDACTED]

[REDACTED]
[REDACTED]

Names / Signatures Deleted for Privacy

Two employees identified as M. F. & M-S. A.


SAFETY OFFICER SIGNATURE

10-5-02
DATE

TESTWELL LABORATORIES, INC.

SPECIFIC TRAINING DOCUMENTATION - 2002

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3. The radiographer's direct observation of the assistant's performance...

J [REDACTED] A [REDACTED]
EMPLOYEE NAME - (print)

[REDACTED SIGNATURE]
EMPLOYEE SIGNATURE

[REDACTED SIGNATURE]
SAFETY OFFICER SIGNATURE

10/11/02
DATE

Name / Signature Deleted for Privacy

One employee identified as J. A.

TESTWELL LABORATORIES, INC
PERFORMANCE EVALUATION FOR RADIOGRAPHERS AND RADIOGRAPHER'S ASSISTANTS

First RADIOGRAPHER F [REDACTED], M. ARM 36084 DUE 10-9-03 DRPD 41398 DUE 8-20-03 BADGE 003

Second or Assistant RADIOGRAPHER A [REDACTED], M. ARM 34521 DUE 5-7-03 DRPD 54068 DUE 4-30-03 BADGE 013

Third or Assistant RADIOGRAPHER A [REDACTED], J. ARM 36082 DUE 10-9-03 DRPD 41396 DUE 5-7-03 BADGE 004

UNIT # 002 ROAD N. LEXINGTON AVE TOWN WHITE PLAINS STATE NY

SPECIAL AUDIT CLASSIFICATION: RETURN FROM LAY-OFF _____ NEW HIRE _____ NAME(s) _____

ISOTOPE: IR-192 _____ or CO-60 SOURCE S/N GI0603 CURIES 82 EXPOSURE DEVICE S/N 005

FIRST METER S/N 35403 DUE 02-20-03 SECOND METER S/N 37556 DUE 2-20-03

1. PERSONNEL MONITORING:

Are personnel wearing a dosimeter, alarm ratemeter, and film or TLD badge?
 Was the dosimeter(s) properly reset before the start of the shift?
 Was the alarm ratemeter(s) tested before the start of the shift?

YES	NO	N/A
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. EQUIPMENT:

Is the exposure device labeling legible?
 Is the exposure device in satisfactory operating condition?
 Was a proper operability check of the equipment performed, prior to the start of radiography?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. RADIOGRAPHIC OPERATIONS:

Is the radiographic operation posted properly?
 Is access to the radiation area restricted properly?
 Is the unrestricted area dose rate less than 2 mR in any one continuous hour?
 Was a perimeter survey performed?
 Is direct surveillance maintained of the High Radiation Area?
 Are surveys of the exposure device and guide tube performed?
 Does the device automatically secure the source assembly when it is cranked back into the fully shielded position?
 Are the operations conducted to keep the radiation exposures ALARA?
 Does the radiographer supervise radiographer's assistant properly?
 Has the customer and/or contractor been informed of the operations and the restricted area?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4. UTILIZATION LOGS:

Are the Area Survey diagrams representative of the actual operations?
 Are the recorded dosimeter readings accurate?
 Is the remainder of the log completed properly?
 Is a copy of a decay chart available?
 Is a copy of a leak test available? (current within the last six months)
 Do the personnel have an O&E Procedures Manual?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5. STORAGE AND TRANSPORTATION:

Was the device properly secured during transport and/or storage?
 Was a proper operability check of the transport container performed?
 Are the transporting vehicle and/or storage facility properly identified?
 Are transporting forms completed and in place?
 Is the NRC Form-3 and/or Agreement State "Notice to Employees" & Emergency Phone Numbers posted?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Document Any Related Subjects Reviewed Or Recommendations Made To Improve The Operations

DATE 12-15-00 INSPECTOR B R Ballard DIVISION NY

Names Deleted for Privacy
 Three employees identified last name first as
 F. M. & A. S. & A. J.



TESTWELL LABORATORIES, INC.

To: TLI File

From: Bruce Ballard

Re: 1975 mRem Badge Reading

Date: November 16, 2001

MEMORANDUM

Explanation of September 2001 badge reading for [REDACTED]

In addition to performing radiography for TLI, [REDACTED] also performs soil compaction testing utilizing a gauge containing a CS-137 Source.

During September 2001, [REDACTED] performed radiography only one day, specifically 09/18/01, but he utilized a gauge on a regular basis. During the month, the gauge was transported and/or stored in [REDACTED] vehicle. Due to the infrequent need to perform radiography, [REDACTED] left his radiography badge in close proximity to the gauge.

On the one shift that [REDACTED] performed radiography, he recorded a dosimeter reading of 2 mRem and when questioned, he stated that his alarm ratemeter never alarmed, the survey meter never indicated a high or abnormal reading and the dosimeter did not go off scale or otherwise malfunction.

The only credible cause for reading of 1975 mRem for the month of September 2001 would be the close proximity to the gauge.

Respectfully Submitted



Bruce Ballard

Name & SS# Deleted for Privacy

One employee identified as J. A.



TESTWELL LABORATORIES, INC.

To: TLI Radiography Personnel From: Bruce Ballard

Re: Storage of Monitoring Badges Date: January 15, 2002

MEMORANDUM

During September 2001, a TLI radiographer's assistant performed radiography on only one shift. During the month he placed his monthly badge in close proximity to a soil compaction gauge.

This caused a monthly badge reading of 1975 mRem for that month and TLI was issued a non-compliance violation by New York State DOL regarding this item.

This memo is to emphasize the importance of adherence to the requirements and conditions of our materials license. Badges must not be stored in proximity to radioactive gauges, radiography licensed material or other sources of radiation.

Sincerely,

Bruce Ballard
RSO

May 15, 2002

On September 18, 2001, I worked as an assistant on a 3 man crew at 909 3rd Ave. When I started working on that particular building, it was cool inside and I was wearing a Jean Jacket where I carried my dosimeter and film badge in the pocket. After a while I felt warm and took my jacket off and hanged it near the camera. When I cranked the camera, the alarm meter did not go off being that I had a good shielding. Then, after closing the camera, I surveyed the area with it was safe then we moved to another location. At that moment I took the dosimeter and film badge from my Jean Jacket's pocket and hanged it on my Jean's pocket. At the end of the shift, my dosimeter reading was 2 mR and it did not go off scale and my rate meter never went off. The meter never showed a high reading when we checked the source.

I also do soil compaction with a cesium-137 gauge and wear a separate badge when I use it. During the month I left the source badge near the gauge when I transported it.

Signature Deleted for Privacy

One employee identified as J. A.