



**VALLEY INSPECTION  
SERVICE INC.**

9/15/05

U.S. Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

**REPLY TO A NOTICE OF VIOLATION**

REF: Valley Inspection Service Inc.  
Docket No. 03031172  
License No. 37-28385-01

Subject: Inspection 03031172/2005001, Valley Inspection Service Inc.  
Allentown, Pennsylvania Site and the G.J. Oliver, Phillipsburg, New Jersey  
And notice of violation

This letter is in response to the above referenced subject.

**Violation "A"**

10 CFR 34.43(f) requires, in part that the licensee maintain records of job performance in accordance with 34.79.

10 CFR 34.79 required, in part that records of semi-annual inspections of job performance for each radiographer and each radiographer's assistant be maintained for a period of three years after they are made.

**Response to "A" Violation:**

After reviewing our records we realized that we had not documented our semi-annual inspections of job performances since June of 2004. We have added the semi-annual performances to our calibration log so as not to have this oversight happen again.

All technicians and assistants have had their semi-annual job performances documented accordingly since the audit was performed.

*JEON*

**NON-DESTRUCTIVE TESTING**

759 N. Fenwick St. • Allentown, PA 18109 • Phone: 610-782-9310 • 1-800-252-VISI • Fax: 610-782-9309

## Violation "B"

10 CFR 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 170 through 189.

49 CFR 172.202, requires, in part, with exceptions not applicable here, that the shipping description of a hazardous material on the shipping paper includes the identification number prescribed for the material as shown in column 4 of the 172.101 Table. Pursuant to 49 CFR 172.101, radioactive material is classified as hazardous material.

49 CFR 172.301, requires, in part, that each person who offers a hazardous material for transportation in a non-bulk packaging must mark the package with the proper identification number (preceded by "UN" or "NA" as appropriate) for the material as shown in the 172.101 Table.

## In response to Violation "B"

1. The shipping papers are pre-printed forms and were printed with the original N.O.S. UN2974 class 7. We did not realize that this Identification had been changed.

We have instructed the technician to change the RQ Radioactive material special form N.O.S. to UN2916 class 7 on all current shipments until new preprinted forms are received. Copy of change attached. New forms will be received in 30 days of this response.

We will make a special notation on our annual audit to review the latest shipping and packaging identification numbers.

2. The original type B(U) packaging identification number for the Cobalt -60 overpack was UN2974, this identification number was changed to UN2916 within the last two years and we did not notice the change in the identification. We ordered new identification plates while the inspectors were still at our facility, the labels were overnighted to us and installed on August 8<sup>th</sup>, 2005.

If you have any questions regarding this response or we need to provide additional information please call me at 610-782-9310.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Kratzer", with a horizontal line extending to the right.

Robert W. Kratzer

President

Valley Inspection Service Inc.

Cc: NRC Regional Administrator Region 1

Kerry M. Frack R.S.O.

NRC file

Annual audit file

# VALLEY INSPECTION SERVICE, INC.

759 N. Fenwick St., Allentown, PA 18109

EMERGENCY PHONE NO. 1-610-782-9310

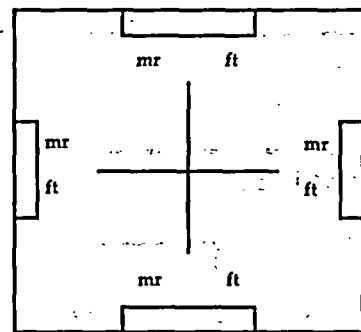
PART A: WARNING INTENTIONAL FAILURE TO RECORD INFORMATION ACCURATELY ON THIS FORM MAY RESULT IN A FINE AND/OR DISCIPLINARY ACTION.

CUSTOMER \_\_\_\_\_ PROJECT \_\_\_\_\_ DATE \_\_\_\_\_  
LOCATION OF SOURCE: CITY \_\_\_\_\_ STATE \_\_\_\_\_

PART B: "SOURCE OF RADIATION" "CAMERA" "SURVEY METER"  
Ir \_\_\_\_\_ Co -60 \_\_\_\_\_ Model No. \_\_\_\_\_ Model No. \_\_\_\_\_  
Curies \_\_\_\_\_ x 37 = GBq \_\_\_\_\_ Serial No. \_\_\_\_\_ Serial No. \_\_\_\_\_  
Model \_\_\_\_\_ Serial No. \_\_\_\_\_ Cal. Due \_\_\_\_\_  
X-Ray \_\_\_\_\_ MA \_\_\_\_\_ KV \_\_\_\_\_ Back-up S/N \_\_\_\_\_

PART C: TRANSPORT TO: Truck/Vehicle No. \_\_\_\_\_ DRIVER: \_\_\_\_\_  
\_\_\_\_\_ mr/hr surface of transport container RQ Radioactive Material Special Form N.O.S. ~~UN2974~~ Class 7  
\_\_\_\_\_ Transport Index (0.1 - 10.0) IR-192 USA/9283/B(U)-85 UN2916  
Label: Class I \_\_\_\_\_ II \_\_\_\_\_ III \_\_\_\_\_ COBALT 60 USA/9035/B(U)-85  
Vehicle Placarded Yes \_\_\_\_\_ No \_\_\_\_\_ mr/hr @ 1 ft. from vehicle surface \_\_\_\_\_ mr/hr @ Driver

PART D: Radiographic Operations: RESULTS OF PHYSICAL SURVEY  
Daily Equipment Inspection Check List (X if acceptable)  
\_\_\_\_ A. Survey Projector for Excessive Radiation Levels  
\_\_\_\_ B. Projector Inspected for damage to fittings, locks and labels  
\_\_\_\_ C. Control Cable and Fittings checked for cuts, breaks or looseness  
\_\_\_\_ D. Crank inspected for looseness  
\_\_\_\_ E. Control checked for freedom of cable movement  
\_\_\_\_ F. Guide tube inspected for cuts, crushing and broken or loose fittings  
\_\_\_\_ G. Collimator (if used) checked for secure attachment  
\_\_\_\_ H. Lights & alarm of exposure booth (if applicable)  
Maintenance inspection performed or witnessed by Radiographer signed below (Pt. G)



\_\_\_\_ Signs \_\_\_\_\_ Rope  
\_\_\_\_ Constant Surveillance \_\_\_\_\_ Collimator \_\_\_\_\_ Exposure Booth  
Record of physical survey made to determine source is in shielded position when securing exposure device  
\_\_\_\_\_ mr/hr surface of exposure device  
TOTAL NO. EXP. \_\_\_\_\_ TOTAL EXP. TIME \_\_\_\_\_  
Personnel Informed \_\_\_\_\_

PART E: Radiographer \_\_\_\_\_ Assistant \_\_\_\_\_  
S/N of Dosimeter: \_\_\_\_\_ Cal Due Date: \_\_\_\_\_ S/N of Dosimeter: \_\_\_\_\_ Cal Due Date: \_\_\_\_\_  
Film Badge No.: \_\_\_\_\_ MR Start \_\_\_\_\_ MR Finish \_\_\_\_\_ Film Badge No.: \_\_\_\_\_ MR Start \_\_\_\_\_ MR Finish \_\_\_\_\_  
Rate Alarm S/N \_\_\_\_\_ Cal Due Date: \_\_\_\_\_ Rate Alarm S/N \_\_\_\_\_ Cal Due Date: \_\_\_\_\_

PART F: TRANSPORT FROM/RETURN: Truck/Vehicle No. \_\_\_\_\_  
Destination: City \_\_\_\_\_ State \_\_\_\_\_ Location \_\_\_\_\_  
1) Returning Projector to vehicle \_\_\_\_\_ 2) Projector not removed from vehicle \_\_\_\_\_ 3) Not Transported \_\_\_\_\_  
\_\_\_\_\_ mr/hr surface transport container  
\_\_\_\_\_ Transport Index (0.1 - 10.0)  
Label Class: I \_\_\_\_\_ II \_\_\_\_\_ III \_\_\_\_\_ 4) Storage Date(s) \_\_\_\_\_  
\_\_\_\_\_ NRC Package Approval No. Attached  
VEHICLE PLACARD Yes \_\_\_\_\_ No \_\_\_\_\_ mr/hr @ 1 ft. from vehicle surface \_\_\_\_\_ mr/hr @ Driver

PART G: The below signed individual(s) herein verify that the above listed information (Part A thru Part F) is accurate and has been completed in accordance with VALLEY INSPECTION, INC.'s license Procedures and State and Federal Regulations.  
In addition, the above named materials have been properly classified, described, packaged, marked and labeled, and are in proper condition for transport according to the applicable regulations of the Department of Transportation.

RADIOGRAPHER \_\_\_\_\_ RADIOGRAPHER'S ASSISTANT \_\_\_\_\_

### CALCULATIONS FOR BOUNDARIES EXCEEDING 2 MR/HR

(A)		(B)		(C)		(D)	(E)		
EXPOSURE TIME PER SHOT	NO. OF EXPOSURES	EXPOSURE TIME PER SHOT	NO. OF EXPOSURES	EXPOSURE TIME PER SHOT	NO. OF EXPOSURES	EXPOSURE TIME TOTAL IN 60 MINUTES (A+B+C=TOTAL)	FACTOR TO FIND ISODOSE $\frac{60 \text{ MIN.}}{D} = \text{FACTOR}$	PERMISSIBLE INTENSITY-MR/HR (E X 2 MR/HR = I)	ACTUAL SURVEY METER READING

FIGURE 2

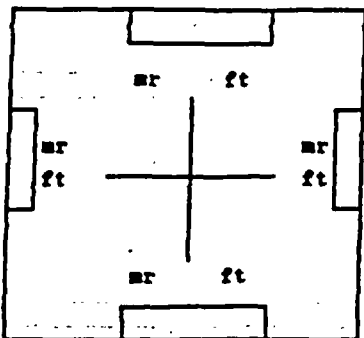


FIGURE 3

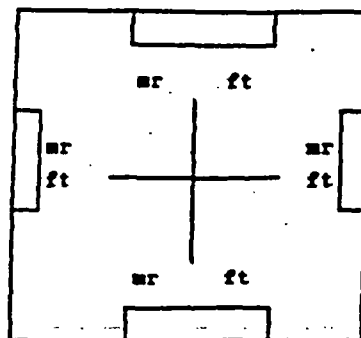


FIGURE 4

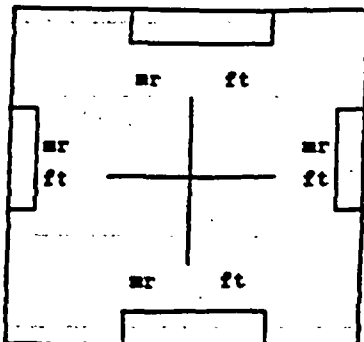


FIGURE 5

