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COMO Tech Inspection  
27640 West 83<sup>rd</sup> Street  
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fax

To: Rachel S. Browder

Fax: 1-817-860-8188

Phone:

From: COMO Tech Inspection

Date: 4/27/2008

Re: License Renewal

Pages: 1 of 8

☐ Urgent

☒ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

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**Notes:**

License # 15-26978-01

Docket # 030-30996

If you have any other questions please feel free to call, 1-913-422-5887

Thank you,

*Raymond C. Hiersche Sr.*  
Ray Hiersche . / COMO Tech Inspection

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COMO Tech Inspection  
27640 West 83<sup>rd</sup> St.  
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913-422-5887

April 26, 2008

License # 15-26978-01  
Docket \$ 030-30996

RE: Deficiencies in license renewal

1. The company that provides our training for New Assistant Radiographers if  
Quality Testing  
2305 Millpark Dr.  
Maryland Heights, MO 63043  
1-314-770-0607
  2. Raymond E. Hiersche Jr will be our Radiation Safety Officer.
  3. Section 8.2 of training program has been changed to receive a minimum of 4 hours o  
hands on training. See Attached.
  4. The passing grade for the training exam has been changed to 80%. See Attached.
  5. Question #47 has been changed. See Attached.
  6. We have our instruments calibrated by: MPM Products  
415 Lillard Rd  
Arlington, TX 76012  
  
And /Or  
NDS Products  
PO.Box 1896  
Pasadena, TX 77501
- Or any other qualified company, we will not be performing the calibration in house.
7. The statement has been changed to say it meets 10 CFR 34.47 requirements. See  
Attached.
  8. O & E Procedure, See Attached

## COMO Tech, Inc. Application for New License

## Supplemental Sheet for Item #8

## Item #8 The Training Program

## 8.2 Training of Radiographer's Assistants

The RSO may designate an individual as a Radiographer's Assistant upon the successful completion of the following requirements.

- A. The individual must receive a copy of the company's Operating and Emergency Procedures.
- B. The individual must receive a minimum of six hours of classroom instruction in the company's Operating and Emergency Procedures from the RSO.
- C. The individual must receive a minimum of 4 hours of actual "hands-on" instruction in the use (under the personal supervision of a radiographer) of the company's exposure devices, sources, related equipment, and survey meters from the RSO.
- D. The individual must successfully complete written and field examinations to verify satisfaction of the above requirements. (See attached Radiographer's Assistant Written and Field Examinations.)
- E. The individual must provide written verification that he has received a copy of the company's Operating and Emergency Procedures and the required eight hours of training. (See statement at the end of written examination.)
- F. The individual must have received instruction in the subjects outlined in 10 CFR Part 34, Appendix A and K.A.R. 28-35-289. This instruction will have been provided by a qualified consultant or qualified commercial firm as determined by the NRC's Agreement States Coordinator.

## COMO TECH, Inc. Application for New License

## Supplement Sheet for Item #8

## Item #8 The Training Program

## Item #8.6.1

## COMO TECH, Inc.

## Radiographer's Assistant Written Examination

As a condition of being designated a Radiographer's Assistant, this examination must be successfully completed by an individual after receiving a minimum of six hours of classroom instructions and two hours of "hands-on" instructions. The instructions, this examination and any necessary retraining shall be provided by the RSO.

The following sample is typical of the examination and answers that will be provided to all Radiographer's Assistant. A passing grade of 80% is required.

## Multiple Choice (four points each)

1. Your copy of the company's Operating and Emergency Procedures must be located:
  - (a) The company's office
  - (b) In a safe location at home
  - \*(c) The job site
2. You are allowed to handle the radiography equipment ONLY:
  - (a) At the beginning and end of the work shift
  - (b) When the radiographer is in the darkroom
  - \*(c) Under the direct supervision of the radiographer
3. Your TLD badge may be:
  - (a) Exchanged with other assistants but not radiographers
  - \*(b) Used only by you
  - (c) Replaced by a dosimeter
4. The most important safety instrument is:
  - \*(a) The survey meter
  - (b) The collimator
  - (c) The dosimeter
5. Your dosimeter reading must be checked:
  - (a) Quarterly
  - \*(b) Twice Daily
  - (c) Monthly

## COMO TECH, Inc. Application for New License

## Supplemental Sheet for Item #8

## Item #8 The Training Program

## Item #8.6.3 Radiographer's Written Examination Continued

36. T ☒ F The HIGH Radiation area must be surveyed during the first exposure to verify correct sign placement.
37. T ☒ F If the source cannot be returned to the shielded position within the exposure device you must lock the device and go for assistance.
38. ☒ T F The survey results of the exposure device after the last exposure of the shift must be recorded on the transport Index.
39. ☒ T F After locking the exposure device in the storage container at the end of the shift the final dosimeter readings must be recorded.
40. T ☒ F In an emergency you are able to retrieve the source if it would not be too difficult.

## Fill in the Blanks (two points each)

41. A survey meter must be calibrated every 3 months or after each repair.
42. The maximum level of removable contamination allowable on a radioactive source is 0.005 microcuries.
43. "HIGH RADIATION AREA" signs must be placed at a job site where an individual would receive 100 mR in one hour.
44. Dosimeters must be checked for accuracy every 1 year(s).
45. During transportation of radioactive material a survey meter must be located in the passenger compartment
46. The radiation level on the surface of any Cobalt-60 exposure device used by this company must not exceed 200 mr/hr.
47. The radiation level at 20 feet from a 65 curie Iridium 192 source is 958.75mr/hr based upon 5164 mr/hr/ci @ 1 foot.

## COMO TECH Inspection

### Operating & Emergency Procedures

Preparations before entering a restricted area or handling  
Radioactive material continued.

7. The model RA-500 is belt worn rate alarm which provides an immediate audible indication in radiation fields in excess of 500 mr/Hr.

The signals are high pitch "chirps" at 450 Mr/hr which becomes a solid tone as the radiation increases. The RA-500 meets 10 CFR 34.47 for perswonnell monitoring.

Features include: A rugged two piece die-cast aluminum case; A system test which includes battery test (red led lights when battery is good) coupled with a audible alarm test; Controls are recessed to minimize chance breakage.

8. Instrument Operation

Slide the on-off switch to the on position. Check the battery and audio tone by pressing the push button at the arrow, using a small diameter object such as a paper clip or jeweler's screwdriver. The red battery light will light if the battery is OK and the alarm will sound. Replace battery if indicated. Do not use if either test fails.

NOTE: IT IS RECOMMENDED THAT THE UNIT BE TESTED PERIODICALLY IN A RADIATION FIELD.

9. Maintenance

When the instrument is on, you will hear a continuous, low frequency "motorboating" sound when held near the ear. If there is no sound, change the battery by unscrewing the backplate and replacing with a 9v battery.

Keep instrument free of dirt and dust.

Keep instrument dry. If it should get wet do not use until completely dry.

The instrument is designed to be worn on the belt. This will reduce unnecessary vibrations that may cause damage.

## Operating & Emergency Procedure

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### Identifying the Malfunctions of defects that could create a Safety Hazard

The RSO will be informed, he will be responsible for:

- A. Identifying and evaluating deviations and reporting defects and failures to comply associated with substantial safety hazards for dedicated items.
- B. Maintain auditable records for the process.
- C. Notify the NRC by fax at-1-301-816-5151 or by phone at-1-301-816-5100 within 2 days following receipt of information. Verification of the fax should be made by calling the NRC center.
- D. Written notification will be made within 30 days, it shall include the name and address of the individual informing the commission, the identification of the facility, nature of the defect, the date and all other stipulations that are required by 10 CFR part 21.21.

### Calibration of Instruments

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Calibrations of Survey Meters will done every 90 days as needed.

Calibration of 500 Alarm will be done once a year.

Calibration of Dosimeters will be done once a year.

If the equipment becomes broken it would be calibrated as needed after repair.