



PO Box 30316 · Billings, MT 59107 · Ph: (406) 839-2013 · Fax: (406) 839-2015

www.mtsindustrialtesting.com

RECEIVED

SEP 09 2009

DNMS

United States
Nuclear Regulatory Commission
Region IV
612 East Lamar Blvd, Suite 400
Arlington, TX 76011-4125

September 4, 2009

SUBJECT : Confirmatory Order Terms & Conditions 1. c), d), e), f), & g)

To Whom It May Concern:

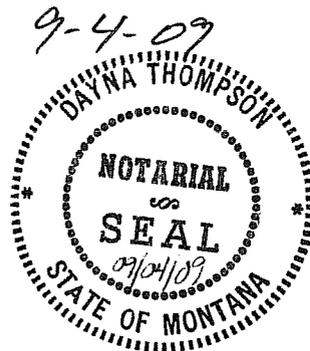
On September 2, 2009 we received recommendations for improvements to be made to our Operating & Emergency Procedures and training program following the evaluation of our existing procedures/program by consultant Richard Rehm of R & M Consulting, Inc. I have attached Mr. Rehm's letter dated August 31, 2009 for your review, and wanted to inform you that Mattingly Testing Services, Inc. (MTS) has accepted all of his recommendations for improvement and agrees to implement them within 45 days of the date of this letter. We also agree to submit a license amendment request incorporating updated procedures based on our implementation of Mr. Rehm's recommendations no later than October 30, 2009 as outlined in the confirmatory order terms and conditions 1. g). Thank you.

Sincerely,

Mark Ficek
President

Ray Sierra
RSO

9-4-09



DAYNA THOMPSON
NOTARY PUBLIC for the State of Montana
Residing at Billings, Montana
My Commission Expires Nov. 24, 2012

Richard Rehm
R & M Consulting, Inc.
3764 Crater Lake Ave.
Billings, MT 59102

Mark Ficek
Mattingly Testing Service, Inc.
12555 West Andrews Lane
Molt, MT 59057

8/31/2009

Dear Mark,

This letter is regarding the evaluation of Mattingly Testing Services, Inc. Operating and Emergency Procedure Manual and an evaluation of Mattingly Testing Services, Inc. training program. R & M Consulting, Inc. recommends the following:

Operating and Emergency Procedure Manual

- 1) Administrative Controls – Implementation of a document control system to track and maintain current and past revisions of the O & E manuals issued to all personnel. This prevents the inadvertent use of out dated material and ensures all personnel are compliant with current instructions.
- 2) Detailed Procedures – Elimination of human error should be the goal of any radiation safety procedure. Detailing guidelines for each camera (locking mechanisms, differences in construction, etc.) and detailing guidelines for configurations of guidetubes and collimators (positioning to prevent damage and proper bend radii) are just examples. Essentially, procedures should be written to remove as much individual interpretation as possible. This should be evaluated by the RSO, by observing actual field radiography, and incorporating step by step procedures.
- 3) Revise numbering system for sections. Standard numbering systems for procedures are written with the section number first followed by sequential paragraphs. Example of section in Mattingly's O & E manual:

Section 2 Paragraph 1.1.1 Fundamentals of radiation safety,

would read: 2.1.1 Fundamentals of radiation safety

This is an industry standard and clarifies references to various paragraphs.

- 4) In reference to Sect. 1 para 1.11, an exhibit should be created outlining guidelines for auditing the performance of designees on a quarterly basis.

5) Inclusion of an exposure log and survey map should be included in the O & E Manual. The exposure log should at a minimum document the date, strength of isotope, actual exposure times (i.e. time source was exposed and time it was retracted). In the event of a boundary violation or accident, this will provide critical information regarding possible exposure times. A survey map, a map indicating radiation areas and distances, will assist with critical information in the event of a boundary violation or accident.

6) ALARA – Evaluations of exposure records should be conducted. If the TEDE of 5 REM per year can be reasonably reduced it should. With regards to exceeding 250mr per month, RSO permission should be attained and documented by the RSO in writing.

Training Program

1) Training and qualifications of designees – Inclusion of training requirements of designees and an assignment in writing should be included in Sect. 2 of the O & E Manual.

2) A specific training program should be developed and maintained by the RSO (a program above and beyond the guidelines required by the O & E Manual). This program should outline specific fundamental topics covered in radiation safety and should be accompanied with a training schedule for at a minimum of semi-annual training (4 hours each). Recent interviews of radiographers and assistant radiographers demonstrate a significant need of a more comprehensive training program.

3) Review of the training records indicates inconsistencies with the maintenance of individual records. A documented review of these records should be mandated by the O & E Manual on a semi-annual basis and conducted by the RSO .

If there are any questions or clarifications regarding this evaluation please contact me.

Sincerely,



Richard Rehm
R & M Consulting, Inc.