

HOME OFFICE
8030 FM 2449
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TEL: 940-479-2177
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RECEIVED

SEP 15 2009

DNMS

U.S. Nuclear Regulator Commission
Attn: Document Control Desk

Docket: 03-06415
License: 42-08459-02

cc: NRC Region IV/James Thompson

“Reply to a Notice of Violation”

1. The reason for this violation is the radiographer involved was wearing his TLD on his outer clothing. When the radiographer went inside to perform radiography from a cold environment he removed his outer clothing containing his TLD and inadvertently left his TLD on the removed clothing, thus performed radiography without his personnel dosimeter on the trunk of his body.
2. All radiographers and radiographers’ assistants have been instructed to wear on the trunk of the body, “on inner clothing”, their personnel dosimeter and to avoid wearing it “on outer clothing” resulting in the inadvertent removal of personnel dosimetry.
Note: See attached notice to all employees
3. To avoid further violations of this nature we have revised our Radiographer’s Inspection List (CII Form 2) line number (6) six to include a check point for verification that personnel dosimetry not be worn on outer clothing. Radiographers Inspection Check List are completed on all active personnel at a minimum quarterly, see Form 2 attached.
4. At this time full compliance has been achieved.

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NOTICE TO ALL EMPLOYEES

All Personal equipment such as Dosimeter and Film Badge / TDL shall be worn on the truck of the body on inner clothing not the Jackets, Bibs, Coveralls, Overalls, Coats or Parkas.

This will help prevent accidental exposure to personal monitoring equipment when making exposures inside and such clothing is removed.

RSO
Drew H. McCorkle

09-11-09

RADIOGRAPHER'S INSPECTION CHECK LIST

TO BE COMPLETED BY RADIATION SAFETY DIRECTOR,
RADIATION SAFETY OFFICER OR DESIGNATED RADIOGRAPHER

- | | Yes | No |
|--|-----|-----|
| 1. Is exposure area restricted in accordance with O & E instructions? | ___ | ___ |
| 2. What is the actual reading at perimeter of Restricted Area? ___ mr/Hr | ___ | ___ |
| 3. Does Radiographer have survey meter in use in accordance with O & E procedures? | ___ | ___ |
| Meter S/N ___ Calibration Due Date ___ - ___ - ___ | | |
| 4. Does Radiographer maintain continuous surveillance of the Restricted Area? | ___ | ___ |
| 5. Does Radiographer complete "RADIATION REPORTS" properly and file proper copies? | ___ | ___ |
| 6. Are Radiographer and Assistants wearing pocket dosimeters, rate alarms, and assigned film badges?
Film Badges/TDL shall be worn on the truck of the body on inner clothing not Jackets, Bibs,
Coveralls, Overalls, Coats or Parkas. | ___ | ___ |
| 7. Is Isotope Camera Storage and transporting facility in accordance with O & E procedures? | ___ | ___ |
| 8. Does Radiographer have company "PROCEDURES for USE and CONTROL of RADIOACTIVE
BYPRODUCT MATERIAL"? | ___ | ___ |
| 9. Is the Radiographic Device in satisfactory working condition? | ___ | ___ |

Date "QUARTERLY INSPECTION and MAINTENANCE" due ___ - ___ - ___

- | | | |
|--|-----|-----|
| 10. Have the customer's supervisory personnel been informed of the radiographic operation and of the Restricted Area? | ___ | ___ |
| 11. Does Radiographer make every effort to keep exposure to personnel at a minimum? | ___ | ___ |
| 12. Has Radiographer received Periodic Training? | ___ | ___ |
| 13. Were other individuals working within the restricted area wearing film badges and dosimeters? | ___ | ___ |
| 14. Was the restricted area posted with "Caution (or Danger) Radiation Area" signs? | ___ | ___ |
| 15. Was the high radiation area posted with "Caution (or Danger) High Radiation Area" signs? | ___ | ___ |
| 16. Did the radiographer properly survey the source projector and source tube and take a radiation reading
1 foot (0.3 m) in front of the source following the radiographic exposure? | ___ | ___ |
| 17. Were radioactive isotopes stored properly and kept locked to prevent unauthorized removal? | ___ | ___ |
| 18. Was the storage area posted with "Caution (or Danger) Radioactive Materials" signs? | ___ | ___ |
| 19. Did the radiographer possess, as applicable, State or NRC rules & regulations for protection
against radiation? | ___ | ___ |
| 20. What recommendations were made to improve safety operations at the time of inspection? | ___ | ___ |

REVIEWED O&E MANUAL AND NEW RULES & REGULATIONS

UNIT NO. _____ LOCATION _____ STATE _____

ISOTOPE _____ ISOTOPE S/N _____ EXPOSURE DEVICE S/N _____

RADIOGRAPHER DOSIMETER S/N DUE DATE FILM BADGE NO. RATE ALARM S/N

ASSISTANT RADIOGRAPHER DOSIMETER S/N DUE DATE FILM BADGE NO. RATE ALARM S/N

ASSISTANT RADIOGRAPHER DOSIMETER S/N DUE DATE FILM BADGE NO. RATE ALARM S/N

DATE: ___ - ___ - ___ INSPECTOR _____ DIVISION _____