

## UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 612 EAST LAMAR BLVD, SUITE 400 ARLINGTON, TEXAS 76011-4125

October 2, 2009

Century Inspection, Inc. ATTN: Drew McCorkle Radiation Safety Officer P.O. Box 9 Ponder, Texas 76259

SUBJECT: REPLY TO NRC INSPECTION REPORT 030-06414/2009-002 AND NOTICE OF

**VIOLATION** 

Dear Mr. McCorkle:

Thank you for your letter dated September 11, 2009, in response to the violation identified in our letter and Notice of Violation (Notice) dated August 18, 2009. We have reviewed your letter and find it responsive to the concerns raised in our Notice. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Sincerely.

Anthony D. Gaines, Chief

Nuclear Materials Safety Branch A

Docket: 030-06415 License: 42-08459-02

Enclosure:

Licensee letter dated September 11, 2009

cc w/enclosure:

Texas State Radiation Control Program Director Alaska State Radiation Control Program Director

cc via e-mail w/enclosure:

E. Collins, RA

A. Howell, D:DNMS

C. Cain, DD:DNMS

A. Gaines, C:NMSB-A

J. Whitten, C:NMSB-B

J. Thompson, NMSB-A

R4\_DNMS-NMSB-A

Hard Copy:

RIV Materials Docket File (5<sup>th</sup> Floor)

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SUNSI Rev Compl.	☑Yes □ No	ADAMS	☑ Yes □ No	Reviewer Initials	JLT
Publicly Avail	☑Yes ☐ No	Sensitive	☐ Yes ☑ No	Sens. Type Initials	JLT
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JLThompson;dlf			ADGaines		
/RA/			AD4		
09/29/09			10/02/09		

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HOME OFFICE 8030 FM 2449 P.O. BOX 9 PONDER, TEXAS 76259 TEL: 940-479-2177 FAX: 940-479-9165



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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 preformed 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.

ADAMS #
Template <u>ML 0927/0/94</u> 257
Date <u>9/28/07</u>QC'd by <u>1</u>

HOME OFFICE 8030 FM 2449 P.O. BOX 9 PONDER, TEXAS 76259 TEL: 940-479-2177 FAX: 940-479-9165



### NOTICE TO ALL EMPOYEES

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

D- H Mark

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 co	poies?				
<ol> <li>Are Radiographer and Assistants wearing pocket dosimeters, rate alarms, and assigne Film Badges/TDL shall be worn on the truck of the body on inner clothing not Jackets Coveralls, Overalls, Coats or Parkas.</li> </ol>	ed film badges?				
7. Is Isotope Camera Storage and transporting facility in accordance with O & E procedure.	ures?				
8. Does Radiographer have company "PROCEDURES for USE and CONTROL of RAI					
BYPRODUCT MATERIAL"?  9. Is the Radiographic Device in satisfactory working condition?					
Date "QUARTERLY INSPECTION and MAINTENANCE" due					
Date QUARTERET INSTECTION and WATHTENANCE date	<b></b>				
10. Have the customer's supervisory personnel been informed of the radiographic operations.	ion 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 do	osimeters?				
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 pro-	otection				
against radiation?  20. What recommendations were made to improve safety operations at the time of inspec	ction?				
REVIEWED O&E MANUAL AND NEW RULES & REGULATIONS					
REVIEWED OWE MANOAL AND NEW ROLES & REGULATIONS					
UNIT NO LOCATION STATE					
UNIT NO LOCATION STATE ISOTOPE ISOTOPE S/N EXPOSURE DEVICE S/N					
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ISOTOPE ISOTOPE S/N EXPOSURE DEVICE S/N	RATE ALARM S/N				
ISOTOPE S/N EXPOSURE DEVICE S/N RADIOGRAPHER DOSIMETER S/N DUE DATE FILM BADGE NO	P. RATE ALARM S/N  D. RATE ALARM S/N				

REV. Sept. 2009

CII FORM 2