

OCT 12 1970

Gen W. Roy, Chief, Materials and Enforcement Branch, CO

INQUIRY FROM MR. TOM HAWKINS CONCERNING POSSIBLE VIOLATIONS OF LICENSED RADIOGRAPHY OPERATIONS AT GENERAL STEEL INDUSTRIES, INC., CASTINGS DIVISION, GRANITE CITY, ILLINOIS

On September 29, 1970, the writer received a telephone call from Mr. Tom Hawkins inquiring as to our training and experience requirements for radiographers. He said that he had called someone in our Glen Ellyn office and they referred him to Headquarters, Division of Materials Licensing. During the discussion, Mr. Hawkins reluctantly identified himself as a union representative at General Steel Industries, representing the radiographers at the plant. He said they are concerned that management is not properly training new personnel, particularly the individuals who will use the 80-curie cobalt 60 source. All allegations are based on a comparison of the training program which was used several years ago (approximately 40 hours of classroom and several months on-the-job training) to the current program which he said consists of a 1-hour bull session per day for two weeks.

I explained the Commission's training and experience requirements as given in Part 34 and our licensing guide (initial, on-the-job, and periodic training, and testing procedures) and told him that each training program is evaluated to be sure it meets these requirements. I also told him that the license issued to General Steel Industries spelled out all regulatory requirements for their radiography program and that I could not comment on their training program without reading the license and all supporting documents. I suggested that he examine the license in order to find out exactly what regulatory requirements the firm must meet. Mr. Hawkins said he was not making any allegations, but was merely trying to find out if the company was living up to their license requirements with regard to training of radiographers who are to use the large cobalt source.

On October 1, 1970, Mr. Hawkins called me again and said that he has requested to see a copy of the license and management will post a copy for him to look at today. He is concerned that management will "pull the wool over his eyes" and not show him everything in the license. I told him that if there is a possible health and safety problem or violation of their license, our Division of Compliance would investigate the matter. He said he is just trying to make sure that the company's training procedures fulfilled the requirements of their license. I assured him that our interests are mutual in this regard.

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OCT 12 1970

I suggested to Mr. Hawkins that he look at the license and if he still had questions or if he had a complaint to call us back; meanwhile, I would pull the license and the background materials.

Follow-up

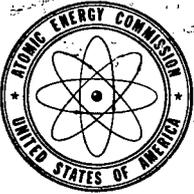
On September 29, 1970, Nate Bassin and I informed Jim Malaro, Gen Roy, and Jim Allen (CO:III) of my conversation with Mr. Hawkins. Following the call on October 1, 1970, I also informed Jim Malaro, Nate Bassin and Gen Roy. Nate then call Jim Allen to inform him of the second call. I understand that Region III plans to inspect the licensee within the next two or three weeks to clarify the situation described by Mr. Hawkins and to be sure the radiography program is being operated in conformance with their license.

ORIGINAL SIGNED BY
J. P. VEERLING, JR.

J. Peter Veerling
Materials Branch
Division of Materials Licensing

DISTRIBUTION:
St. Br. Dist.
CO:III
JCMalaro
NBassin

CRESS	OFFICE ▶	DMI				
T5 R03-04	URNAME ▶	JPVeerling:hh				
	DATE ▶	10/6/70				



UNITED STATES
ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

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A handwritten signature or set of initials is located in the top right corner, enclosed in a circle.

October 9, 1970

Gen W. Roy, Chief, Materials Inspection and Enforcement Branch
Division of Compliance, Headquarters

COMPLIANCE INQUIRY MEMORANDUM
GENERAL STEEL INDUSTRIES, INCORPORATED - GRANITE CITY, ILLINOIS
LICENSE NO. 12-08271-01
UNION ALLEGATIONS ON LACK OF TRAINING

On October 2, 1970, a telephone call was received at CO:III by Boyce H. Grier, Director, from a Mr. Tom Hawkins, who identified himself as a union steward at the above subject licensee facility. Mr. Hawkins stated that he had spoken with Mr. Moretti of this office and Messrs. Bassin and Veerling of DML prior to this phone call. Hawkins stated that he wished to make a complaint against General Steel Industries regarding their failure to maintain an adequate radiographer training program at their Granite City facilities. He stated that their license requires them to give 30 hours of classroom training and four weeks on-the-job training as part of the training program. He alleged that the company is now giving only about five hours of classroom training and that that is not of a high quality.

Mr. Hawkins was informed that he would be contacted during the week of October 5, and a meeting would be arranged to obtain more specific information with respect to his allegation. He stated that he would be working days at the plant during the week of October 5 and that the telephone number at the plant was Area Code 618 - GL2-2120, and his extension was 282. He further stated that he could be contacted at other times and on weekends at his residence, 457 Florida, East Alton, Illinois 62024. His home telephone number is Area Code 618 - 259-1214.

Mr. Hawkins indicated that part of his problem was with the Radiation Safety Officer for this plant, H. E. Norris. He added that he had requested Norris to show him a copy of the AEC license and that Norris had refused. He stated that because of this disagreement with Norris, he had been attempting to meet with the company president, Mr. Richard Lich. The president had been out of town but was due back in the office on Monday, October 5.

Gen W. Roy

- 2 -

October 9, 1970

CO:HQ was notified of this information on October 2, 1970, and informed that an investigation would be initiated on this matter during the week of October 5.

CO:III:DLF

James M. Allan
Senior Radiation Specialist

INSPECTION FINDINGS AND LICENSEE ACKNOWLEDGMENT

C T De 4

1. LICENSEE <i>General Steel Industries</i> <i>1417 State Street</i> <i>Spring Valley, Illinois</i>	2. REGIONAL OFFICE REGION III, DIVISION OF COMPLIANCE 120 OAKBROOK CENTER MALL - SUITE 410 OAK BROOK, ILLINOIS 60521
3. LICENSE NUMBER(S) <i>12-5271-1</i>	4. DATE OF INSPECTION <i>11-15-67</i>

5. INSPECTION FINDINGS

- A. No item of noncompliance was found.
- B. Rooms or areas were not properly posted to indicate the presence of a RADIATION AREA. 10 CFR 20.203(b) or 34.42
- C. Rooms or areas were not properly posted to indicate the presence of a HIGH RADIATION AREA. 10 CFR 20.203(c) (1) or 34.42
- D. Rooms or areas were not properly posted to indicate the presence of an AIRBORNE RADIOACTIVITY AREA. 10 CFR 20.203(d)
- E. Rooms or areas were not properly posted to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(e)
- F. Containers were not properly labeled to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(f) (1) or (f) (2)
- G. A current copy of 10 CFR 20, a copy of the license, or a copy of the operating procedures was not properly posted or made available. 10 CFR 20.206(b)
- H. Form AEC-3 was not properly posted. 10 CFR 20.206(c)
- I. Records of the radiation exposure of individuals were not properly maintained. 10 CFR 20.401(a) or 34.33(b)
- J. Records of surveys or disposals were not properly maintained. 10 CFR 20.401(b) or 34.43(d)
- K. Records of receipt, transfer, disposal, export or inventory of licensed material were not properly maintained. 10 CFR 30.51, 40.61 or 70.51
- L. Records of leak tests were not maintained as prescribed in your license, or 10 CFR 34.25(c)
- M. Records of inventories were not maintained. 10 CFR 34.26
- N. Utilization logs were not maintained. 10 CFR 34.27

Loren J. Hester
 (AEC Compliance Inspector)

6. LICENSEE'S ACKNOWLEDGMENT

The AEC Compliance Inspector has explained and I understand the items of noncompliance listed above. The items of noncompliance will be corrected within the next 30 days.

11-15-67 (Date) *John T. Williams* (Licensee Representative — Title or Position)

UNITED STATES ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE

INSPECTION FINDINGS AND LICENSEE ACKNOWLEDGMENT

C. II. Ke # 3

<p>1. LICENSEE GENERAL STEEL INDUSTRIES 1417 STATE STREET GRANITE CITY, ILLINOIS</p>	<p>2. REGIONAL OFFICE REGION III, DIV. OF COMPLIANCE OAKBROOK PROFESSIONAL BLDG. OAK BROOK, ILLINOIS</p>
<p>3. LICENSE NUMBER(S) 12-8271-1</p>	<p>4. DATE OF INSPECTION 6-1-66</p>

5. INSPECTION FINDINGS

- A. No item of noncompliance was found.
- B. Rooms or areas were not properly posted to indicate the presence of a RADIATION AREA. 10 CFR 20.203 (b) or 34.42
- C. Rooms or areas were not properly posted to indicate the presence of a HIGH RADIATION AREA. 10 CFR 20.203 (c) (1) or 34.42
- D. Rooms or areas were not properly posted to indicate the presence of an AIRBORNE RADIOACTIVITY AREA. 10 CFR 20.203 (d)
- E. Rooms or areas were not properly posted to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203 (e)
- F. Containers were not properly labeled to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203 (f) (1) or (f) (2)
- G. Storage containers were not properly labeled to show the quantity, date of measurement, or kind of radioactive material in the containers. 10 CFR 20.203 (f) (4)
- H. A current copy of 10 CFR 20, a copy of the license, or a copy of the operating procedures was not properly posted or made available. 10 CFR 20.206 (b)
- I. Form AEC-3 was not properly posted. 10 CFR 20.206 (c)
- J. Records of the radiation exposure of individuals were not properly maintained. 10 CFR 20.401 (a) or 34.33 (b)
- K. Records of surveys or disposals were not properly maintained. 10 CFR 20.401 (b) or 34.43 (d)
- L. Records of receipt, transfer, disposal, export or inventory of licensed material were not properly maintained. 10 CFR 30.51, 40.61 or 70.51
- M. Records of leak tests were not maintained as prescribed in your license, or 10 CFR 34.25 (c)
- N. Records of inventories were not maintained. 10 CFR 34.26
- O. Utilization logs were not maintained. 10 CFR 34.27

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 U.S. ATOMIC ENERGY COMMISSION
 REGISTRY MAIL SECTION

Edmund J. Flaska
(AEC Compliance Inspector)

6. LICENSEE'S ACKNOWLEDGMENT

The AEC Compliance Inspector has explained and I understand the items of noncompliance listed above. The items of noncompliance will be corrected within the next 30 days.

6/2/66
(Date)

H. O. Harris - RADIATION OFFICER
(Licensee Representative - Title or Position)

UNITED STATES ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE

INSPECTION FINDINGS AND LICENSEE ACKNOWLEDGMENT

I-A Re #2

1. LICENSEE <i>General Steel Industries 1417 State Street Granite City, Illinois</i>	2. REGIONAL OFFICE REGION III, DIV. OF COMPLIANCE OAKBROOK PROFESSIONAL BLDG. OAK BROOK, ILLINOIS 60523
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3. LICENSE NUMBER(S)
12-8271-1

4. DATE OF INSPECTION
2-19-65

5. INSPECTION FINDINGS

- A. No Item of noncompliance was found.
- B. Rooms or areas were not properly posted to indicate the presence of a RADIATION AREA. 10 CFR 20.203(b) or 31.302
- C. Rooms or areas were not properly posted to indicate the presence of a HIGH RADIATION AREA. 10 CFR 20.203(c) (1) or 31.302
- D. Rooms or areas were not properly posted to indicate the presence of an AIRBORNE RADIOACTIVITY AREA. 10 CFR 20.203(d)
- E. Rooms or areas were not properly posted to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(e)
- F. Containers were not properly labeled to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(f) (1) or (f) (2)
- G. Storage containers were not properly labeled to show the quantity, date of measurement, or kind of radioactive material in the containers. 10 CFR 20.203(f) (4)
- H. A current copy of 10 CFR 20, a copy of the license, or a copy of the operating procedures was not properly posted or made available. 10 CFR 20.206(b)
- I. Form AEC-3 was not properly posted. 10 CFR 20.206(c)
- J. Records of the radiation exposure of individuals were not properly maintained. 10 CFR 20.401(a) or 31.203(b)
- K. Records of surveys of seals were not properly maintained. 10 CFR 20.401(b) or 31.303(d)
- L. Records of receipt, transfer, disposal, export or inventory of licensed material were not properly maintained. 10 CFR 30.41, 40.61 or 70.51
- M. Records of leak tests were not maintained as prescribed in your license, or 10 CFR 31.105(c).
- N. Records of inventories were not maintained. 10 CFR 31.106
- O. Utilization logs were not maintained. 10 CFR 31.107

Loren J. Hutter
(AEC Compliance Inspector)

6. LICENSEE'S ACKNOWLEDGMENT

The AEC Compliance Inspector has explained and I understand the items of noncompliance listed above. The items of noncompliance will be corrected within the next 30 days.

(Date) _____ (Licensee Representative - Title or Position) _____

UNITED STATES ATOMIC ENERGY COMMISSION
DIVISION OF COMPLIANCE

INSPECTION FINDINGS AND LICENSEE ACKNOWLEDGMENT

I - A, Co #1

<p>1. LICENSEE</p> <p>General Steel Industries, Inc. 1417 State Street Granite City, Illinois</p>	<p>2. REGIONAL OFFICE</p> <p>Region III, Division of Compliance Suite 410, Oakbrook Prof. Bldg. Oak Brook, Illinois</p>
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<p>3. LICENSE NUMBER(S)</p> <p>12-8271-1</p>	<p>4. DATE OF INSPECTION</p> <p>August 14, 1963</p>
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5. INSPECTION FINDINGS

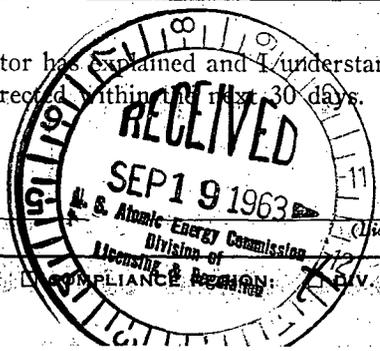
- A. No Item of noncompliance was found.
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- C. Rooms or areas were not properly posted to indicate the presence of a HIGH RADIATION AREA. 10 CFR 20.203(c)(1) or 31.302
- D. Rooms or areas were not properly posted to indicate the presence of an AIRBORNE RADIOACTIVITY AREA. 10 CFR 20.203(d)
- E. Rooms or areas were not properly posted to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(e)
- F. Containers were not properly labeled to indicate the presence of RADIOACTIVE MATERIAL. 10 CFR 20.203(f)(1) or (f)(2)
- G. Storage containers were not properly labeled to show the quantity, date of measurement, or kind of radioactive material in the containers. 10 CFR 20.203(f)(4)
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- I. Form AEC-3 was not properly posted. 10 CFR 20.206(c)
- J. Records of the radiation exposure of individuals were not properly maintained. 10 CFR 20.401(a) or 31.203(b)
- K. Records of surveys or disposals were not properly maintained. 10 CFR 20.401(b) or 31.303(d)
- L. Records of receipt, transfer, disposal, export or inventory of licensed material were not properly maintained. 10 CFR 30.41, 40.61, or 70.51
- M. Records of leak tests were not maintained as prescribed in your license, or 10 CFR 31.105(c).
- N. Records of inventories were not maintained. 10 CFR 31.106
- O. Utilization logs were not maintained. 10 CFR 31.107

Gen. M. Roy *Gen W. Roey*
(AEC Compliance Inspector)

6. LICENSEE'S ACKNOWLEDGMENT

The AEC Compliance Inspector has explained and I understand the items of noncompliance listed above. The items of noncompliance will be corrected within the next 30 days.

(Date) _____ (Licensee Representative - Title or Position) _____



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JAN 21 1963

R. G. Page, Chief, Enforcement Branch
Division of Licensing and Regulation

TELEPHONE CALL FROM DR. WILL KONNEKER, NUCLEAR CONSULTANTS CORPORATION, ST. LOUIS, MISSOURI, CONCERNING OUR NOTICE OF VIOLATION DATED JANUARY 7, 1963, TO GENERAL STEEL INDUSTRIES, GRANITE CITY, ILLINOIS

LR:RGP

Dr. Konneker explained that he had been contacted by officials of General Steel Industries to advise them as to corrective actions which should be taken with respect to those deficiencies described in our notice dated January 7 to the company.

Dr. Konneker questioned, with respect to item 1 of the notice, whether or not physical radiation surveys are necessarily required by 10 CFR 20.201(b). I explained that such surveys are not required so long as an adequate evaluation can otherwise be made to assess the radiation hazards and to assure compliance with the provisions of 10 CFR 20.

Dr. Konneker questioned also whether or not licensees are required to leak test sealed sources precisely at six month intervals. He stated that he had been under the impression that the AEC did not consider a violation to occur unless the time interval between tests "considerably exceeds" the six month period. I informed Dr. Konneker that a violation exists if the time interval between leak tests is more than six months even if only by one day. I further explained that the tests could be conducted more frequently than once every six months. Dr. Konneker asked the same question concerning frequency for calibrating radiation survey instruments and I explained that 10 CFR 31.104 requires that they be calibrated at intervals not to exceed three months. He expressed his understanding of the requirements and stated that where his company is contracted to perform a service for a licensee, he would assure that the terms of the contracts are precisely met so as not to exceed the prescribed periods in the regulations.

cc: Compliance Division, HQ (2)

OFFICE ▶	LR:EB				
SURNAME ▶	<i>RGP</i> RGPage:bjy				
DATE ▶	1/21/63				