

May 10, 2002

RE: Evaluation of Licensed Activities  
Tracking Number 02-A-0029

Brent Clayton  
Nuclear Regulatory Commission  
Region III  
801 Warmeville Road  
Lisle, Illinois 60532-4351

Dear Mr. Clayton:

Professional Service Industries, Inc. (PSI) has performed an exhaustive and comprehensive record evaluation as requested in your April 15, 2002 letter. PSI's Corporate Safety Department performed this evaluation independent of operations. Due to the sensitive nature of the subject and in an effort to comply with the "need to know" statement in your letter, PSI conducted only one interview, which was with the manager of the Pittsburgh – Electrical department. It is the intention of this department to conduct more interviews after receiving approval from the Nuclear Regulatory Commission (NRC).

PSI's Pittsburgh – Electrical Department is authorized to perform repairs and calibrations under a NRC Radioactive Materials License. Pittsburgh – Electrical repairs PSI's and other outside organization's portable moisture/density gauges as well as performing calibrations on other types of equipment. Since November 1, 2001, the location has received/repared over 300 moisture/density gauges. Upon receipt of licensed radioactive equipment, members of the department perform an inspection and note any items of "non-conformance" on a "Non-Conforming Gauge Log". The following are the findings of the evaluation conducted since receipt of your letter.

1. The concerned individual (CI) is concerned that portable moisture-density gauges shipped to the repair/calibration facility were not leak tested or had expired leak testing results.

Evaluation Findings:

During our record review, it was determined that 17 devices were indicated by the Pittsburgh Electrical department as either missing leak test certificates or having expired leak tests. Further review indicated that only one actually had an expired leak test. However, there is evidence that some of the devices were received without a leak test certificate attached. Although some devices were received without leak test certificates, our investigation indicates that the personnel who received the devices complied with license condition 14. B, by performing a leak test and then placing the device in secure storage until receipt of a valid certificate.

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It should be noted that all other gauges were found to have a current leak test certificate on file at the Corporate office (internally received devices).

PSI will reinforce to the local offices that each device must have a current leak test certificate (a wipe performed and analyzed within the past six- (6) months) before shipping. In the past, PSI has reminded the local offices that a current leak test certificate must accompany the device to the repair facility. The most recent information was sent in October 2001 and is attached for your review.

2. The CI is concerned that portable moisture-density gauges shipped to the repair/calibration facility were transported without an adequate radiation survey of the transportation package. The CI stated that gauges have been received at the calibration facility with the gauge shutter partially open.

#### Evaluation Findings:

A review of the repair/calibration "NON-CONFORMING GAUGES" log indicated that there were 11 gauges received with shutters open. After a thorough records review, the survey readings for 10 of the 11 gauges that were indicated as having shutters open do not indicate any high exposure on the PSI "Report of Radioactive Materials Transfer" form. The direct on contact readings ranged from 0.29 mrem to 5.0 mrem on the receiving section of PSI's "Report of Radioactive Materials Transfer" form for shipping and receiving sections on the form. Therefore, the survey readings between the shipper and receiver closely mirrored one another. PSI contacted one of the device manufacturers and inquired as to what survey readings would be expected if the shutter of the gauge were open. The manufacturer indicated that the survey readings of this particular model would be approximately 100 mrem/hr at surface and 2 mrem/hr at 1 meter. Additionally, PSI's "Report of Radioactive Materials Transfer" form has a section for both the shipper and receiver to note any physical or operating discrepancies. There was no indication by shipper or receiver that the shutter was open. During our review, transfer paperwork for one gauge indicated that a shutter might have been in the open position.

Future (and current) corrective actions will be to notify the client, and if necessary, the regulatory authority about the condition of the shutter. If this were to be a consistent issue, PSI would definitely notify the proper authorities and discontinue servicing the client's equipment. Additionally, the Corporate Safety Department will conduct a more detailed investigation interviewing the shipper and receiver on the difference in the survey readings. PSI will attempt to determine if the gauge shutter failed, resulting in a possible opening of the shutter during transportation. PSI will also ensure that employees who receive licensed material perform and document surveys at receipt of equipment at the receiving area and not at the maintenance area where the equipment is officially signed in.

3. The CI is concerned that portable moisture-density gauges shipped to the repair/calibration facility were shipped without any paperwork.

Our evaluation pertaining to the shipping information is inconclusive. We are unable to determine if the four devices indicated on the "Non - Conforming Gauge Log" were received with the emergency response information. PSI is confident that the devices were shipped with the "shippers declaration" because the carriers will not accept the shipment without one. It is our impression that the CI believes that PSI's internal transfer paperwork is required by regulation. The manager of the department indicated during the interview that the "Non - Conforming Gauge Log" is marked as missing paperwork if the device is received without internal transfer paperwork, which substantiates our opinion. However, it should be noted that we are not certain that this is the case all of the time. While the CI is correct that the paperwork, as required by internal procedures, was not shipped with the device, the devices were shipped with the appropriate paperwork as required by 49 CFR 172.

As a corrective action, PSI will reiterate the importance of shipping devices in compliance with PSI's internal procedures. Devices that are received from external clients without the proper shipping documentation will not be received by PSI. Additional training will be administered to PSI's Pittsburgh - Electrical department to ensure understanding of NRC and Department of Transportation (DOT) regulations.

Sincerely,



Christopher G. Smith  
Corporate Safety Director  
Professional Service Industries, Inc. (PSI)

CGS  
cc: File