

Hanson, Latischa

From: Vasquez, Michael
Sent: Tuesday, February 19, 2013 1:35 PM
To: Poston-Brown, Martha; Hanson, Latischa
Subject: FW: Confirmatory Order EA-11-124
Attachments: SKMBT_C28013021517561.pdf

FYI ...

From: sercoli [<mailto:sercoli@bellsouth.net>]
Sent: Friday, February 15, 2013 6:17 PM
To: Vasquez, Michael
Subject: Confirmatory Order EA-11-124

Mr. Vasquez

I'm forwarding you all items and correspondence that we have done on Confirmatory Order EA-11-124.

Thanks

Steve Ercoli
Quality Inspection & Testing, Inc.
(337) 288-7206

sercoli@bellsouth.net

Company Policy Statement



Quality Inspection & Testing, Inc.

3808 Commercial Drive
New Iberia, LA 70560
PHONE: (337) 359-8660
FAX: (337) 359-8659

RECEIVED

SEP 04 2012

DNMS

August 30, 2012

US NRC
Region IV
1600 East Lamar Blvd.
Arlington, TX. 76011-4511
Attention: Michael Vasquez

RE: Confirmatory Order – EA-11-124

Dear Michael,

In accordance with the confirmatory order listed above, I am submitting 2 documents for your review. The first document is our Company Policy Statement as required in Paragraph A, Page 4. The second document for your review is the personal letter that I wrote and mailed to every employee @ Quality Inspection.

I have also attached a copy of our new "SAFETY CULTURE POLICY STATEMENT" for your review. These will be laminated and posted at every physical location that I have, as well as placed in every vehicle I own.

I want to ensure the NRC that we are working very diligently to address and close each item in the CO. My next plan of attack will be contracting and external trainer to help my HSE Manager and myself re-write our training policies in accordance with the CO.

If you have any questions, please feel free to call me at the number listed above.

Sincerely,


Jason K. Stone
President

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1228
FAX: (435) 781-1228
ADAMS # ML12255A033
Template
Date 09/11/12 QC'd by DYA

Reporting Safety Concerns



Quality Inspection & Testing, Inc.

3808 Commercial Drive
New Iberia, LA 70560
PHONE: (337) 359-8660
FAX: (337) 359- 8659

August 29, 2012

RE: Reporting Safety Concerns

To All,

I am writing this letter to open a discussion on reporting and communicating safety concerns to management personnel. I want every employee to know that we value your honesty, your ethics, and your opinion in identifying and communicating concerns to management personnel, as well as the overall implementation and compliance with Federal and State rules and regulations.

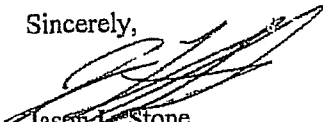
I want every manager and employee to know that we have an "open-door" policy. This policy allows employees to voice their concerns to their direct supervisor, the HSE Manger, or me - the Owner of the company. I want our managers and employees to be engaged and involved in the everyday operations where safety is concerned.

I also want everyone to know, managers and employees alike, that you will not suffer any consequences, retaliations, or harassment for voicing your concerns to management. I will personally guarantee your concerns will be addressed and dealt with immediately. We want to achieve and maintain an environment where employees feel free to raise their concerns directly to their supervisors and if necessary, allowing them access to other means of raising and addressing their concerns, such as any State (Louisiana DEQ) or Federal (NRC) agency.

I am also writing to inform you that we are implementing a new "Safety Culture Policy" for Quality Inspection. This policy is necessary to change the current culture of our industry, where safety is secondary and only major issues are conveyed to management. We want openness and honesty from our employees, and we will reward good behavior. We are implementing a safety award program that we be effective on October 1st, 2012. This will be a quarterly bonus program that will reward perfection. I will release all of the details to your direct supervisors and they will relay the requirements and rewards associated with the bonus program.

I have put my heart and soul into this company and I want to thank everyone for their help. We would not exist without our employees and we value your opinion, your honesty, and your hard work. If you have any concerns please let me know and we can work together to solve them.

Sincerely,



Jason L. Stone
President

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

Company Policy statement Concerning safety and Security



Quality Inspection & Testing, Inc.

3808 Commercial Drive
New Iberia, LA 70560
PHONE: (337) 359-8660
FAX: (337) 359-8659

August 29, 2012

RE: Company Policy Statement concerning Safety and Security

To All,

This statement is being issued in reference to a Confirmatory Order – EA-11-124 that we received from the US Nuclear Regulatory Control on August 10, 2012.

This order was issued after the NRC conducted an inspection at a temporary jobsite in Rock Springs, Wyoming. Two (2) QI&TI employees were found to have violated the rules and regulations listed below:

- 1) Failure to control and maintain constant surveillance of licensed material that is not in storage
- 2) Violation of the required security measures set forth in our increased control program
- 3) Failure to wear, on the trunk of the body, a direct reading dosimeter, an alarming rate meter, and a film badge
- 4) Failure to maintain copies of the specific records and documents required at temporary jobsites.

The NRC furthermore concluded that several of these violations were **DELIBERATE** and **WILLFUL!** Listed below, I will discuss each and every violation, what penalties were suffered, and how we feel about these violations from managements' perspective.

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

Violations and Penalties

VIOLATIONS

Violation #1 – Failure to control and maintain constant surveillance of licensed material that is not in storage

- a. Both QI&TI employees were in the darkroom, developing film for approximately 15 minutes. The camera was left outside, with no supervision, and was still connected to the crank-out. *This was considered a Deliberate and Willful Violation!*

Violation #2 – Violation of the required security measures set forth in our increased control program

- a. The camera was left unattended for approximately 15 minutes. Our policies and procedures require constant surveillance of any and all sources while not in storage. Both the technician and the helper were trained and determined to be trustworthy and reliable. *This was considered a Deliberate and Willful Violation!*

Violation #3 – Failure to wear, on the trunk of the body, a dosimeter, rate meter, or film badge

- a. Both QI&TI employees were in violation of Federal and State regulations concerning radiation safety practices and procedures. Both employees had their safety equipment in the vehicle and deliberately refused to wear it. *This was considered a Deliberate and Willful Violation!*

Violation #4 - Failure to maintain copies of the specific records and documents required at temporary jobsites

- a. The employees loaded out a new vehicle for this project. The manager at the time was rushing them to “hurry up” and cover a job. These employees made the decision to leave the office with just the equipment necessary to complete the project. They did not have the Louisiana Regulations, the NRC Regulations, the Notice to Employees forms, or the required Survey Sheets / Transportation Documents!

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

PENALTIES

- 1) Quality Inspection & Testing, Inc. was hereby ordered to pay a CIVIL FINE to the US NRC for the violations committed by your fellow employees.
- 2) QI&TI was ordered to hire an "External Contractor" to write a new training program regarding the NRC's enforcement policy, the different types of willful disregard and deliberate misconduct, the potential enforcement sanctions that the NRC may take, the potential criminal sanctions that the Department of Justice may take against the employee, and the Ethics of complying with regulatory requirements.
- 3) After the External Contractor's new training program is completed, it must be submitted to the NRC for approval. Upon approval, the External Contractor will train our Safety Representatives on the new program.
- 4) After our Safety Representatives receive the new training, every employee at QI&TI is required to be retrained and tested on the new program.
- 5) QI&TI will have to revise the Operating and Emergency Procedures in accordance with the new training program.

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

Management perspective

MANAGEMENTS' PERSPECTIVE

These violations are completely unacceptable in accordance with our Radiation Safety Program, our Safety Manual, and our Operating and Emergency Procedures. Deliberate and Willful violations will not be tolerated or accepted by anyone at Quality Inspection. We feel that both Management and Employees are responsible for the implementation and enforcement of these programs.

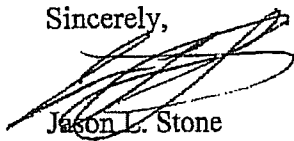
These deliberate and willful violations have caused a great financial burden for Quality Inspection. Instead of spending money on new employees, new equipment, employee raises, or bonuses; we are spending it on civil fines and new training programs – because 2 employees and their manager took it upon themselves to deliberately break the law. Every deliberate violation is submitted to the Department of Justice in Washington DC for prosecution. The DOJ decided not to prosecute these two individuals, instead allowing the NRC to enforce and punish them, along with QI&TI.

QI&TI is pursuing the NRC and the Agreements states to “PULL” the State issued Radiation Safety Training Cards for these 2 employees and the manager involved. We will do whatever is necessary to enforce the rules and regulations as required by Federal and State Law, including banishment from our industry. We will help the State and Federal agencies prosecute and punish any employee that commits a Deliberate and Willful Violation.

From this point forward, QI&TI has a ZERO-Tolerance policy on Radiation Safety Violations. It does not matter is the violation was committed out of willful disregard or pure ignorance. It is our feeling that every employee has been trained by an approved training facility in regards to the 40 hour radiation safety training program, that every employee has received his ON-THE-JOB training with an approved instructor, and that every employee will be reminded and re-trained after the “External Contractor” has completed and issued the program.

As the owner of this company, I feel that I have Honest, Ethical, and Responsible managers and employees working with me. I am asking for everyone’s help with the implementation and enforcement of these rules. I have attached our new “Safety Culture Policy” for your review. The Safety Culture Policy Statement will be posted at every physical address and in every vehicle / darkroom that is owned by QI&TI.

Sincerely,



Jason L. Stone
President

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

Safety Culture Policy Statement



Quality Inspection & Testing, Inc.

3808 Commercial Drive
New Iberia, LA 70560
PHONE: (337) 359-8660
FAX: (337) 359- 8659

SAFETY CULTURE POLICY STATEMENT

“THE CORE VALUES AND BEHAVIORS RESULTING FROM A COLLECTIVE COMMITMENT BY LEADERS AND INDIVIDUALS TO EMPHASIZE SAFETY AND TO ENSURE PROTECTION OF PEOPLE AND THE ENVIRONMENT”

Our Beliefs

- 1) Management demonstrates a commitment to safety in their decisions and behavior
- 2) Issues potentially impacting safety are identified, fully evaluated, and promptly addressed and corrected
- 3) All individuals take personal responsibility for safety
- 4) The process of planning and controlling work activities is implemented so that safety is maintained
- 5) Opportunities to learn about ways to ensure safety are sought out and implemented
- 6) A safety conscious work environment is maintained where personnel feel free to raise safety concerns without fear of retaliation, intimidation, harassment, or discrimination
- 7) Communications maintain a focus on safety
- 8) Trust and respect permeate throughout the organization
- 9) Individuals avoid complacency and continuously challenge existing conditions and activities in order to identify discrepancies that might result in deficiencies or inappropriate action

7080 Mayard Rd.
Houston, TX 77041
PHONE: (713) 896-8097
FAX: (713) 896-8892

215 South 1000 East
Vernal, UT 84078
PHONE: (435) 781-1225
FAX: (435) 781-1228

Resume

Laurie McGowen

**LAMCO & ASSOCIATE
7 SWITCHBUD PLACE
192C-284
THE WOODLANDS TX 77380
(936) 271-1487**

**SUMMARY OF EXPERIENCE FOR
LAURIE MCGOWEN**

Radiation Consultant for LAMCO & ASSOCIATE (LO5152) for 14 years.

Over 30 years experience in the NDT/Radiation Safety field.

Certified Health Physicist I and NDT Inspector.

Works with state and government agencies to improve radiation safety in the industrial sector.

PROJECT EXPERIENCE

Nuclear Plants	Power Stations	Theme Parks
Chemical Plants	Pipelines	Road & Bridge Construction
Compressor Stations	Aircraft suppliers	Building Construction
Refineries	Various Airlines	Vendor Shops
Pulp & Paper	NDT companies	Military

PROFESSIONAL ORGANIZATIONS

American Society of NDT
Plant Safety Council
Nuclear plant Safety Committee
HP Society
Manchester's Who's Who Society
Professional Women Association
Security Committee
Various State Organizations

EDUCATION/ CERTIFICATIONS

Itasca High School	Thames Valley College	
United State Air Force	San Jacinto Technical College	
University of TX Health Science Center		
Radiation Safety Associates HP Training		
Various Safety Committee and Training Courses:		
OSHA Supervisors Course	Nuclear Security	Certified Trainer
D.O.T. training Course	Respirator Training	Various Others

Hazardous Communication Supervisors Course
EMPLOYMENT HISTORY

LAMCO & ASSOCIATE Radiation Consulting Company
1998- Present
Owner/Instructor/Consultant/CEO/Inspector/Litigator

Licensed as a radiation safety consultant for industrial radiography through-out the United States.
Licensed to perform emergency retrievals or deal with incidents involving radioactive material.
Licensed Instructor for radiation safety/RSO and emergency procedures.
Perform audits of company records and employee performance.
Perform-in-house safety training for companies.
Responsible for training new employees in the aspects of radiation safety for all industrial companies.
Represent clients at stat and regulatory enforcement hearings.
Assist with license application and O & E manuals.
Perform audits of ALARA programs.
Investigate accidents and incidents in the industry.
Assist with nuclear outages.
Assist with regulation changes and proposals.

Brief Summary of employment before LAMCO

Petroleum Industry Inspectors
Houston TX
1987-1998
Manager and Radiation Safety Officer

H& G Inspection
Houston, TX
1986-1987
NDT Supervisor/RSO/Lead technician

United Nuclear
Norwich CT
1984-1986
NDT Supervisor

United States Air Force
1979-1983
NDT Inspector/Staff Sergeant

Approval LAM

E-MAIL

From: Jason Stone (Jason@qiti.org)
To: sercoli@bellsouth.net;
Date: Fri, February 15, 2013 10:32:05 AM
Cc:
Subject: FW:

From: Vasquez, Michael [mailto:Michael.Vasquez@nrc.gov]
Sent: Wednesday, October 17, 2012 9:59 AM
To: Jason Stone
Cc: Hanson, Latlscha
Subject:

Jason,
Attached is the acknowledgement letter approving LAM as your contractor. Hard copy is in the mail. Call if you have any questions.



G. Michael Vasquez, Chief
Nuclear Materials Branch A
US NRC Region IV
1600 E. Lamar Blvd
Arlington, TX 76011-4511

Office: 817-200-1130
Fax: 817-200-1188

LAMCO & ASSOCIATE

Phone: 936 271-1487

Fax : 936 271-1907

TIMELINE FOR QISI UNDER NRC CONFIRMATORY ORDER EA-11-124

DATE OF CONFIRMATORY ORDER: AUGUST 10, 2012

IDENTIFIER IN CONFIRMATORY ORDER	DEADLINE DATE
SECTION III C:1	
CONTRACT WITH EXTERNAL CONTRACTOR	OCTOBER 10, 2012
SUBMIT RESUME TO NRC FOR APPROVAL	SEPTEMBER 26, 2012
TRAINING OUTLINE SUBMITTED TO NRC	NOVEMBER 10, 2012
TRAINING FOR CURRENT MANAGERS	60 DAYS FROM NOVEMBER 10 (IS THE EARLIEST AS IT IS FROM THE TIME THE OUTLINE IS APPROVED) JANUARY 10, 2013 AT EARLIEST PLAN IS TO BE DONE IN DECEMBER
TRAINING FOR EMPLOYEES	MAY 10, 2013
WRITTEN TEST	AFTER COMPLETION OF TRAINING
RETEST	(TENATIVE DATE MAY 15, 2013)
LETTER STATING TRAINING FOR EMPLOYEES IS COMPLETED	JUNE 10, 2013
SECTION III C:2	
TRAINING PROGRAM FOR NEW HIRES	FEBRUARY 10, 2013
SECTION III C:4	
RECORDKEEPING REQUIREMENTS	TRAINING RECORDS FROM 2012 -2017
SECTION III D	
REVISE O & E	NOVEMBER 10, 2013
SECTION III A	
COMPANY POLICY STATEMENT PRESIDENT LETTER	SEPTEMBER 10, 2012

SECTION III E

NDT PAPER PRESENTATION

FEBRUARY 10, 2013

SECTION III G

PENALTY PAYMENT

SEPTEMBER 10, 2012

IS THIS THE TIMELINE YOU CAME UP WITH AND IF SO DO YOU WANT ME TO EMAIL YOU A CONTRACT OR DO YOU HAVE ONE TO SEND IN.

First

Safety Culture outline for QITI

Rejected By

Latisha Hanson



LAMCO & ASSOCIATE



Phone: 936 271-1487

Fax : 936 271-1907

SAFETY CULTURE OUTLINE FOR QITI MANAGEMENT

TIMELINE: 8 HOURS

THE TRAINING IS A CLASSROOM TRAINING WITH A POWERPOINT PRESENTATION

I. MANAGEMENT, SAFETY REPRESENTATIVE & SUPERVISORS ROLES IN A HOSTILE-FREE WORK ENVIRONMENT. (estimated 45 min)

A. Leadership – the starting point

- 1) Role Model
- 2) Set & Enforce Policies
- 3) Demonstrate
- 4) Communicate

B. Following Procedures

- 1) Understanding & following the procedures in QITI's O & E and Safety procedures set down when performing Radiography
- 2) Review & explain the importance of following the regulations set by the regulatory agencies. (NRC, agreement states, DOT)

C. Accident Investigation Process

II. ORIGIN OF SAFETY CULTURE (estimated 30 minutes)

A. How & Why Safety Culture came about

- 1) Where & When first established & Used
- 2) Review how safety culture is working in other industries.
- 3) Review & discuss NRC's safety culture brochure
- 4) How to incorporate the safety values into the company.

III. ETHICS, MORALS & INTEGRITY (estimated 1 hour)

A. Define Ethics & Morals

B. Explain Integrity

C. Discuss fraud in the workplace

- 1). Review current business fraud
- 2). Cases in the news

D. Human error

- 1). Examples of accidents in the workplace
- 2). Examples of accidents in industrial radiography

E. Taking Responsibility

IV. RECOGNIZING & REPORTING SAFETY VIOLATIONS (estimated 1 hour)

- A. Accidents**
- B. Primary Causes**
- C. Human Factors**
- D. Following Procedures**
- E. Reporting procedures**
- F. No concern is too small or insignificant**
- G. Responding to a safety concern**
 - 1) Suspending work activities**
 - 2) Correcting the problem**
 - 3) Corrective action taken or needed to be taken**

V. FOUR A'S (estimated 45 minutes)

- A. Attitude**
 - 1). Learning to deal with all types**
- B. Awareness**
- C. Action**
- D. Accountability**

VI. PERFORMING THE TASK

- A. Ensure you have all the required equipment to perform radiography**
- B. Ensure you have all the required documentation & that you understand the importance of it's existence**
 - 1) QITI O & E**
 - 2) Agreement State/ NRC Regulations**
 - 3) DOT regulations**
 - 4) Survey sheets/Shipping papers**
- C. Follow the security procedures as set forth by QITI as well as the NRC**

VII. WILLFULNESS (estimated 1 hour)

- A. Define Willfulness**
- B. Review NRC Escalated Manual Ch 6**
 - 1) Explain Willful violations**
 - a. Intentional or Deliberate**
 - b. Careless Disregard**
 - c. Basic elements of a deliberate violation**
 - 1. Review elements**
 - 2. Examples of deliberate**
 - 3. Review 10CFR 30.10**

VIII. PUNISHMENT (estimated 30 minutes)

- A. Company punishment to supervisors/employees**
- B. NRC sanctions against company/employees**
 - 1) Escalated Enforcement**
 - 2) Civil Penalty**
 - 3) Revoke or suspend license**
- C. Criminal sanctions**

IX. EMPLOYEE PROTECTION (estimated 30 minutes)

- A. Review 10 CFR 30.7**
- B. Discuss & Explain discrimination**
- C. Management Support**
- D. Accountability**

X. HUMAN FACTORS (estimated 30 minutes)

- A. Stress**
- B. Health**
- C. Environment**

XI. OPEN DISCUSSION (estimated 45 minutes)

- A. Questions & Answers**
- B. Exam**

NRC
correspondence



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

October 16, 2012

EA-11-124

Jason L. Stone, President
Quality Inspection & Testing, Inc.
3808 Commercial Drive
New Iberia, Louisiana 70560

SUBJECT: CONFIRMATORY ORDER EA-11-124

Dear Mr. Stone:

Thank you for your letter dated August 30, 2012 [ML12255A033], and e-mails dated September 20 [ML12284A368], October 2, 2012 [ML12284A368], and October 12, 2012 [ML12289A832]. These submissions were made as part of the corrective actions required by NRC Confirmatory Order (EA-11-124) dated August 10, 2012. We have reviewed the information submitted and we find that the requirements for those portions of the Order identified below have been met.

Section V.A of the Confirmatory Order Issue, within 30 days of the date of the Confirmatory Order (August 10, 2012), a company policy statement to QIT employees regarding how unacceptable deliberate violations are, the importance of maintaining security over licensed material, and the ethics of complying with regulatory requirements.

Section V.B of the Confirmatory Order Issue, within 30 days of the date of the Confirmatory Order (August 10, 2012), a personal letter from the president of QIT to employees regarding his expectations in identifying and communicating concerns to QIT management, as well as overall compliance with NRC regulations.

Section V.C.1.b

Submit the resume of the external contractor proposed to develop and perform the training of current QIT employees, for NRC review and approval, at least 15 days before the time QIT intends to execute the contract with the external contractor.

With this letter, the NRC approves the external contractor that QIT proposed under V.C.1.b of the Confirmatory Order.

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,

/RA/

G. Michael Vasquez, Chief
Nuclear Materials Safety Branch A

Docket: 150-00017
License: 10 CFR 150.20

cc w/copy of licensee's e-mails:
Louisiana Radiation Control Program Director

cc w/enclosure via e-mail:

- E. Collins, RA
- A. Howell, DRA
- A. Vogel, D:DNMS
- V. Campbell, DD:DNMS
- R4DNMS_MS-A
- M. Herrera, Fee Coordinator
- R. Browder, ACES
- C. Maier, ACES

Hard Copy:
RIV Materials Docket File

S:\DNMS\~ESCALATED ENFORCEMENT\ACTIVE CASES\Quality Inspection & Testing, Inc\2012 Confirmatory Order+Compliance\Ack LTR-Trainer Resume

ADAMS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	SUNSI Rev Complete	Reviewer Initials: LMH
Publicly Available	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Sensitivity: Nonsensitive	
RIV:NMSB-A		C:NMSB-A	
LMHanson;dlf		GMVasquez	
/RA/		/RA/	
10/16/12		10/16/12	

OFFICIAL RECORD COPY

T=Telephone

E=E-mail

F=Fax



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

November 29, 2012

EA-11-124

Jason L. Stone, President
Quality Inspection & Testing, Inc.
5808 Commercial Drive
New Iberia, LA 70560

SUBJECT: CONFIRMATORY ORDER EA-11-124

Dear Mr. Stone:

Thank you for your emails dated November 9, 2012 [Agencywide Documents Access and Management System (ADAMS) Accession No. ML12326A513], and November 27, 2012 [ADAMS Accession No. ML12333A078]. These submissions were made as part of the corrective actions required by NRC Confirmatory Order (EA-11-124) dated August 10, 2012 [ADAMS Accession No. ML12226A457]. We have reviewed the information submitted and we find that the requirements for those portions of the Order identified below have been met.

Section V.C.1.c

At least 15 days prior to the start of training, but no later than 30 days after executing the contract with the external training contractor, QIT will submit for NRC review and approval an outline of the topics to be covered during the training session(s). The training will include the topics identified in Section C.3 of the Confirmatory Order.

With this letter, the NRC approves the topics to be covered during training session(s) proposed by QIT under Section V.C.1.c of the Confirmatory Order.

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,

/RA/

G. Michael Vasquez, Chief
Nuclear Materials Safety Branch A

Docket: 150-00017
License: General License pursuant to
10 CFR 150.20

Quality Inspection & Testing, Inc.

- 2 -

cc:

Tim B. Knight, Administrator
Louisiana Dept. of Environmental Quality
Office of Environmental Compliance
Emergency & Radiological Services Division
Office of Environmental Services
P.O. Box 4312
Baton Rouge, LA 70821-4312

Scott W. Ramsay
Radiological Services Supervisor
Wyoming Office of Homeland Security
5500 Bishop Blvd., Door #1
Cheyenne, WY 82009

Internal distribution:

- E. Collins, RA
- A. Howell, DRA
- A. Vogel, D:DNMS
- V. Campbell, DD:DNMS
- R4DNMS_MS-A
- M. Herrera, Fee Coordinator
- R. Browder, ACES
- C. Maier, ACES

Hard Copy:

RIV Materials Docket File

S:\DNMS\~ESCALATED ENFORCEMENT\ACTIVE CASES\Quality Inspection & Testing, Inc\2012 Confirmatory Order+Compliance\Ack LTR-Training Outline

ADAMS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> SUNSI Review Complete	Reviewer Initials: LMH
		<input checked="" type="checkbox"/> Publicly Available	<input checked="" type="checkbox"/> Non-Sensitive
		<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive
RIV:NMSB-A	ACES	C:NMSB-A	
LMHanson;dlf	MCMaier	GMVasquez	
/RA/	PAJayroe (for)	/RA/	
11/28/12	11/29/12	11/29/12	

OFFICIAL RECORD COPY

T = Telephone E = E-mail F = Fax

Safety Culture Outline for QITI

ACCEPTED

By Latisha Hanson



LAMCO & ASSOCIATE



Phone: 936 271-1487

Fax : 936 271-1907

SAFETY CULTURE OUTLINE FOR QITI MANAGEMENT/EMPLOYEES

TIMELINE: 8 HOURS

THE TRAINING IS A CLASSROOM TRAINING WITH A POWERPOINT PRESENTATION

I. MANAGEMENT, SAFETY REPRESENTATIVE & SUPERVISORS ROLES IN A HOSTILE-FREE WORK ENVIRONMENT. (estimated 45 min)

A. Leadership – the starting point

- 1) Role Model**
- 2) Set & Enforce Policies**
- 3) Demonstrate**
- 4) Communicate**

B. Following Procedures

- 1) Understanding & following the procedures in QITI's O & E and Safety procedures set down when performing Radiography**
- 2) Review & explain the importance of following the regulations set by the regulatory agencies. (NRC, agreement states, DOT)**

C. Accident Investigation Process

II. ORIGIN OF SAFETY CULTURE (estimated 30 minutes)

A. How & Why Safety Culture came about

- 1) Where & When first established & Used**
- 2) Review how safety culture is working in other industries.**
- 3) Review & discuss NRC's safety culture brochure**
- 4) How to incorporate the safety values into the company.**

III. ETHICS, MORALS & INTEGRITY (estimated 1 hour)

A. Define Ethics & Morals

B. Explain Integrity

C. Discuss fraud in the workplace

- 1). Review current business fraud**
- 2). Cases in the news**

D. Human error

- 1). Examples of accidents in the workplace**
- 2). Examples of accidents in industrial radiography**

E. Taking Responsibility

VIII. PUNISHMENT (estimated 30 minutes)

- A. Company punishment to supervisors/employees**
- B. NRC sanctions against company/employees**
 - 1) Escalated Enforcement**
 - 2) Civil Penalty**
 - 3) Revoke or suspend license**
- C. Criminal sanctions**

IX. EMPLOYEE PROTECTION (estimated 30 minutes)

- A. Review 10 CFR 30.7**
- B. Discuss & Explain discrimination**
- C. Management Support**
- D. Accountability**

X. HUMAN FACTORS (estimated 30 minutes)

- A. Stress**
- B. Health**
- C. Environment**

XI. OPEN DISCUSSION (estimated 45 minutes)

- A. Questions & Answers**
- B. Exam**

From: Jason Stone (Jason@qiti.org)
To: sercoli@bellsouth.net;
Date: Fri, February 15, 2013 10:35:55 AM
Cc:
Subject: FW: outline for managers and employees

From: Lamco2 [mailto:lamco2@aol.com]
Sent: Tuesday, January 08, 2013 2:15 PM
To: Jason Stone
Subject: Re: outline for managers and employees

I thibnk we should get together next week I will have the managers training done by mid week so perhaps thursday or friday will be a good day so we can get this over with

Laurie McGowen

lamco2@aol.com

-----Original Message-----

From: Jason Stone <Jason@qiti.org>
To: Hanson, Latischa <Latischa.Hanson@nrc.gov>
Cc: lamco2 <lamco2@aol.com>
Sent: Tue, Jan 8, 2013 12:57 pm
Subject: RE: outline for managers and employees

No, we will use the one submitted for employees and managers!

Thank you,
Jason L. Stone
President

Quality Inspection & Testing, Inc.
3808 Commercial Drive
New Iberia, LA. 70560
PH: 337-359-8660
FAX: 337-359-8659

From: Hanson, Latischa [mailto:Latischa.Hanson@nrc.gov]
Sent: Tuesday, January 08, 2013 12:53 PM
To: Jason Stone
Cc: lamco2@aol.com; Vasquez, Michael
Subject: RE: outline for managers and employees

Jason,

Today, in reviewing the **Confirmatory Order, Section V.C.2. Training for new employees and annual refresher.**

Which requires, in part, that within 120 days of the date of the Confirmatory Order, QIT will submit for the NRC approval, the training program described in sections C.1. and C.3. along with associated procedure(s) that describe the initial training which must be provided to new employees who will be conducting NRC licensed activities and the annual refresher training that will be conducted for those employees who are performing NRC licensed activities.

Will you be creating a separate training outline different than the one submitted to the agency as titled below? If so, the 120 days for this outline was due 12/10/12?

Print

Thanx,

Latischa



Latischa Hanson, M.Sc., Health Physicist
USNRC/DNMS Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511
(817) 200-1286 (o)
(817) 200-1188 (f)
Latischa.Hanson@nrc.gov

From: Hanson, Latischa
Sent: Friday, December 21, 2012 10:17 AM
To: 'Lamco2@aol.com'
Cc: jason@qiti.org; Vasquez, Michael
Subject: RE: outline for managers and employees

Laurie,

As per our telephonic discussion this morning, I have reviewed your amended QITI training outline that has one edited update:

- changing the outline title from:

SAFETY CULTURE OUTLINE FOR QITI MANAGEMENT [ADAMS Accession number [ML12326A513]

- changing the outline title to:

SAFETY CULTURE OUTLINE FOR QITI MANAGEMENT/EMPLOYEES [ADAMS Accession number TBD]

As per our discussion, this change documents this training outline will be used for QIT management **AND** employees

As we discussed, these documents are publicly available for review & can be access via www.nrc.gov website for public access to our Agencywide Documents Access and Management System (ADAMS) tab:

I understand that you are going to forward this email to QIT, so that they may submit *Confirmatory Order (CO) documents in accordance with:*

Section V. H.:

Unless otherwise specified, all documents required to be submitted to the NRC will be sent to: US NRC Region IV, Director, Division of Nuclear Materials Safety, 1600 Lamar Blvd., Arlington, Texas 76011

Latischa

From: Lamco2@aol.com [<mailto:Lamco2@aol.com>]
Sent: Friday, December 21, 2012 9:37 AM
To: Hanson, Latischa
Cc: jason@qiti.org
Subject: outline for managers and employees

Okay how is this let me know and then I will get with QITI
Sorry for the confusion

Field Audit Form

Radiation Personnel

Quality Inspection & Testing, Inc.
3808 Commercial Dr.
New Iberia, La 70560

Unannounced Audit

Audit Date:				
-------------	--	--	--	--

Personnel Information

Radiographer		Signature	
Assistant #1		Signature	
Assistant #2		Signature	

Personnel Monitoring Devices/Survey Instruments/Exposure Device Information

Survey Meter Model:		S/N:		Date Due for Calibration:	
Survey Meter Model:		S/N:		Date Due for Calibration:	
Exposure Device Model:		S/N:		Source Type/Model:	

Pocket Dosimeter S/N

Rate Alarm S/N

Film Badge ID#

Radiographer			
Assistant #1			
Assistant #2			

Audit Checklist

Item	Acceptable	Unacceptable
Are workers in the restricted area using pocket dosimeters, rate alarms, and film badges monitoring devices properly?		
Is the radiation area adequately being surveyed and unauthorized access controlled?		
Is the barricade of the "Radiation Area" adequate?		
Are enough "Radiation Area" warning signs present?		
Is the "High Radiation Area" Posted?		
Are all surveys being performed and recorded properly?		
Is a copy of the Operating and Emergency Procedures, Radiation License, and applicable state or federal regulations present?		
Is the exposure device being properly transported?		
Is the exposure device being secured properly to prevent unauthorized removal?		
Was the exposure device and associated equipment properly inspected before use? (Listed on Radiation Survey Sheet)		
Is all equipment being used calibrated?		
Was proof of employee's radiation certification status available?		
Increase Control		
T&R Employee, Fingerprints, Background Check		
Alarm on Vehicles		
Camera Vault		
Employee Paper Work		

Audit performed by:		Signature:	

Increased Controls to 5 Years



Quality Inspection & Testing, Inc.

3808 Commercial Drive
New Iberia, La. 70560
(337) 359-8660 • FAX: (337) 359-8659

Increased Control #5 – Policy and Procedures

All information pertaining to the increased controls shall be maintained for a minimum of 5 years. All background checks shall be kept in the employee's personal file.

All information pertaining to the Increased Controls shall be locked in a fire proof safe.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

This procedure outlines the administrative guidelines and organization structure of Quality Inspection & Testing, Inc.

This portion of the Operating and Emergency Procedure is not to be used for operational questions or for steps to take in an emergency.

FOR EMERGENCY SITUATIONS THAT MAY OCURE AT ANY TIME THE RADIOGRAPHER IS INSTRUCTED TO REFER TO THE EMERGENCY PROCEDURES SECTION OF THIS MANUAL.

Table of Content Administrative Procedure

- ❖ 1.1 to 1.1.5 President/Owner
- ❖ 1.2 to 1.2.13 Radiation Safety Office
- ❖ 1.3 to 1.3.6 Radiographer Trainee *Trainees*
- ❖ 1.4 to 1.4.7 Radiographer
- ❖ 1.5 to 1.5.1.5 Radiographer Trainee
- ❖ 1.6 Organizational Chart
- ❖ 2 to 2.3 Permanent Storage and Use Description
- ❖ 3 to 3.1 Training Program Requirements
- ❖ 3.2 to 3.2.12 Radiographer Trainees Requirements
- ❖ 3.3 to 3.3.5 Radiographers Requirements
- ❖ 3.4 to 3.4.4 Previous Radiographers Requirements
- ❖ 3.5 to 3.5.3 Radiographer Trainer Requirements
- ❖ 3.6 to 3.6.2 Periodic Refresher Training
- ❖ 4 to 4.12 Leak Testing of Sealed sources
- ❖ 5 to 5.7 Internal Inspection
- ❖ 6 to 6.3 Records Management
- ❖ 7 to 7.8 Quarterly Inspections, Maintenance of Equipment
- ❖ 8 to 8.4 Source Exchange
- ❖ 9 to 9.3 Occupational Dosimeter
- ❖ 10 to 10.3 Public Dose
- ❖ 11 to 11.5 Field and Temporary Jobsite
- ❖ 12 to 12.7 Radiation survey Instruments
- ❖ 13 to 13.4 Labeling, Storage, and Transportation

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- ❖ 14 to 14.2 Operating and Emergency Procedure
- ❖ 15 to 15.7 Personnel Monitoring
- ❖ 16 to 16.1 Radiation surveys
- ❖ 17 to 17.1 Surveillance
- ❖ 18 to 18.1 Posting
- ❖ 19 to 19.1 Recordkeeping Requirements
- ❖ 20 to 20.2 Records of receipt and transfer sealed sources
- ❖ 21 to 21.1 Records of Radiation survey Instruments
- ❖ 22 to 22.1 Records of leak testing of sealed sources and device containing depleted uranium
- ❖ 23 to 23.2 Utilization Logs
- ❖ 24 to 24.2 Records of Inspection and Maintenance
- ❖ 25 to 25.1 Records of alarm system and Entrance Control checks
- ❖ 26 to 26.1 Records of Training and Certificates
- ❖ 27 to 27.1 Copies of Operating and emergency Procedures
- ❖ 28 to 28.1 Records of personnel procedures
- ❖ 29 to 29.1 Records of Radiation Surveys
- ❖ 30 to 30.1 Form of Records
- ❖ 31 to 31.2 Location of documents and Records
- ❖ 32 to 32.2 Records of quarterly inventory
- ❖ 33 to 33.3 Notifications
- ❖ 34 to 34.2 Permanent radiographic Installations
- ❖ 35 to 35.1 Background Checks
- ❖ 36 to 36.1 Vehicles Carrying Radioactive Material
- ❖ 37 to 37.1 Vehicles Portable Storage Vault
- ❖ 38 to 38.1 Disposal

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

COMPANY STRUCTURE/DELEGATION OF RESPONSIBILITIES

1.1. President/Owner

- 1.1.1. Employ only qualified personnel that will be able to carry out required procedures as directed.
- 1.1.2. Approve and review any expenditure in the area of radiation protection.
- 1.1.3. Hold the Radiation Safety Officer responsible for the establishment of or any changes in the education programs outlined in these procedures.
- 1.1.4. Personally review any radiation exposures in excess of the limits outlined in QI & TI ALARA policy and ensure that proper corrective measures are followed.
- 1.1.5. Exclusively responsible for authorizing procedural changes and issuing new requirements to comply with regulatory changes.
- 1.1.6. All Radiation safety Officers will be audited by upper management every 6 months on record keeping and performance.

1.2. Radiation Safety Officer

- 1.2.1. The Radiation Safety Officer (RSO) shall, at a minimum, meet the requirements of 10 CFR34 and DEQ. RSO an individual who a qualified radiographer have a minimum of 2000 hours (one year full-time field experience) of hands on experience as a qualified radiographer, and have formal training in establishing and maintaining a radiation program.
- 1.2.2. Establish and oversee operating, safety, emergency, and ALARA procedures and training programs. Review them bi-annually to ensure that the procedures are current.
- 1.2.3. Ensure that required radiation surveys and leak tests are performed and documented in accordance with this procedure.
- 1.2.4. Ensure that personal monitoring devices are calibrated and used properly by occupationally-exposed personnel, that records are kept of the monitoring results, and that timely notifications are made as required by 10 CFR 34.
- 1.2.5. Ensure that all personnel are following the rules set forth by the 10 CFR, DEQ and this procedure.
- 1.2.6. Report to the President, and have the authority, to institute corrective actions, including shutdown of operations, when necessary in emergency situations or unsafe conditions.
- 1.2.7. Maintain records in accordance with 10 CFR.
- 1.2.8. Ensure proper storing, labeling, transporting, monitor emergency events, material disposal, device security, interaction with NRC and DEQ and use of

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

exposure devices and sources of radiation to ensure public and personnel safety.

1.2.9. Comply with inventory, inspection, and maintenance programs in accordance with 10CFR and DEQ.

1.2.10. The RSO shall ensure that radiation safety activities are being performed in accordance with approved procedures and regulatory requirements in the daily operation of the licensee's program.

1.2.11. The minimum qualifications, training, and experience for RSOs for industrial radiography are as follows:

- Completion of the training and testing requirements of DEQ and § 34.43(a);
- 2000 hours of hands-on experience as a qualified radiographer in industrial radiographic operations; and
- Formal training in the establishment and maintenance of a radiation protection program.

1.2.12. RSO has appropriate training and/or experience in the field of ionizing radiation, and in addition, has adequate formal training with respect to the establishment and maintenance of a radiation safety protection program.

1.2.13. The specific duties and authorities of the RSO include, but are not limited to:

- Establishing and overseeing all operating, emergency, and ALARA procedures as required by DEQ and 10 CFR part 34, part 20, and reviewing them regularly to ensure that the procedures in use conform to current DEQ and 10 CFR part 34, part 20 procedures, conform to other NRC regulations and to the license conditions.
- Overseeing and approving all phases of the training program for radiographic personnel, ensuring that appropriate and effective radiation protection practices are taught;
- Ensuring that required radiation surveys and leak tests are performed and documented in accordance with the regulations, including any corrective measures when levels of radiation exceed established limits;
- Ensuring that personnel monitoring devices are calibrated and used properly by occupationally-exposed personnel, that records are kept of the monitoring results, and that timely notifications are made as required by DEQ and § 20.2203 of this chapter; and
- Ensuring that operations are conducted safely and to assume control for instituting corrective actions including stopping of operations when Necessary.
- RSO shall control all spare keys to radiography vehicles No keys will be issued to anyone not approved until "unescorted access" has been approved

1.3. Radiographer Trainer

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 1.3.1. A Radiographer Trainer shall meet the requirements outlined in the regulations CFR-34.43 and be listed on the Radioactive Materials License issued by the DEQ.
- 1.3.2. The Radiographer Trainer shall be responsible for training and overseeing Radiographer Trainees, while they handle the radioactive sources and related equipment. The Radiographer Trainer shall be responsible for documenting such training by completing a Form on each Radiographer Trainee that they observe as designated by the RSO.
- 1.3.3. Report to the RSO any deficiencies in the program or associated problems.
- 1.3.4. Is currently state carded
- 1.3.5. The Radiographer Trainer shall maintain control of radiography vehicle at all times
- 1.3.6. The Radiographer Trainer shall have unescorted access at all times.

1.4. Radiographer

- 1.4.1. A Radiographer shall be a person who has met the requirements outlined in 10 CFR 34.43.
- 1.4.2. Responsible for any radiation producing devices assigned to him or in his possession for transport, etc.
- 1.4.3. Responsible for having all required equipment on hand while performing radiographic operations.
- 1.4.4. Responsible for ensuring that all required surveys are performed properly and documented.
- 1.4.5. Responsible for complying with QI & TI procedures, at all times while performing radiographic operations.
- 1.4.6. Report to the RSO any deficiencies in the program or associated problems.
- 1.4.7. Is currently state carded.

1.5. Radiographer Trainee

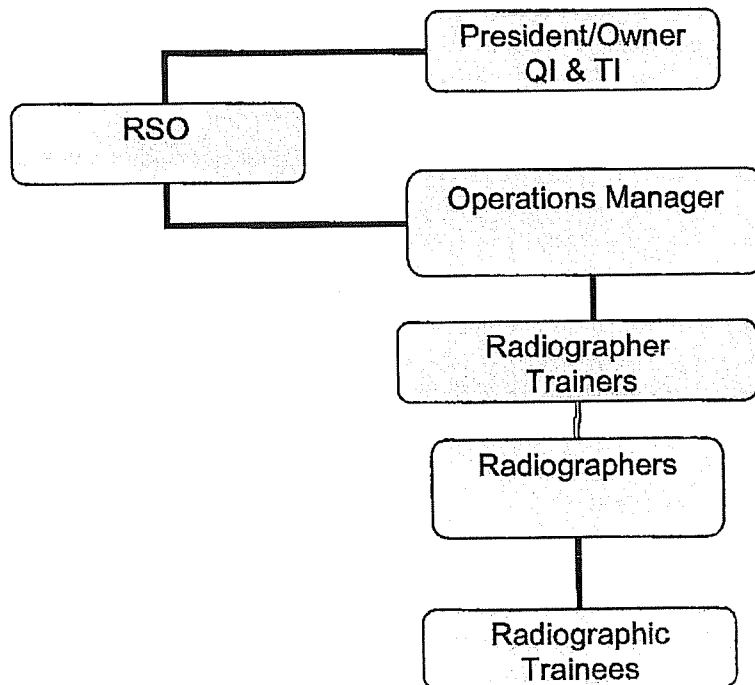
- 1.5.1. A Radiographer Trainee shall meet the requirements outlined in the regulations, which are as follows:
 - 1.5.1.1. The individual shall be given the following training prior to acting as a Radiographer Trainee:
 - 40 hours Safety Training by an organization approved by QI& TI or the 10 CFR 34.43 and DEQ.
 - 40 hours of on-the-job training with an approved Radiographer Trainer, as a third man only, documented hours.
 - 1.5.1.2. The RSO will then submit the proper training forms to the DEQ for approval. DEQ will issue a card certifying the Trainee. The Trainee shall not perform radiographic operations as part of a 2 man crew until he has received approval from the RSO.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 1.5.1.3. Perform radiography under the direct supervision of a Radiographer Trainer designated by QI & TI.
- 1.5.1.4. Responsible for understanding the O & E of QI & TI and be able to follow the direct instructions of the Radiographer Trainer.
- 1.5.1.5. Report to the RSO any deficiencies in the program or associated problems.

1.6. Organizational Chart



Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

2. Permanent Storage and Use Descriptions

2.1. Permanent Storage

2.1.1. The physical location of the permanent storage facility for all radioactive materials issued under this license shall be at:

2.1.2. A physical sketch of the facility is located in Attachment 1.

2.2. Radiographic Material Storage Area

2.2.1. The storage area for the QI & TI Radiographic Materials License shall be described as the following:

- A separate room not used for any other reason except radiographic material storage.
- The access door to the storage area shall incorporate a locking mechanism which shall prevent entrance by unauthorized personnel. Authorized personnel allowed to enter shall be determined by the RSO. Only authorized personnel shall be issued access keys to the source storage room.
- The entrance to the storage area shall be posted with a sign that reads "Caution-Radioactive Materials".
- All radiation levels shall be ≤ 2 mr/hr at any outer surface of the storage area.

2.3. Use Areas at Facility

Radioactive materials may be used on-premises at the QI & TI facility described above provided documented evidence is available that the conditions are maintained for remote field locations.

3. Training Program Requirements

3.1. Scope

The purpose of this section is to establish training program requirements to be followed when qualifying radiographic personnel under QI & TI license.

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

3.2. Radiographer Trainees Requirements

- 3.2.1. Successful completion of a 40-hour course on the topics outlined in 10 CFR 34.43 and approved by QI & TI and, if necessary, the DEQ.
- 3.2.2. 40 hours on-the-job training with a Radiographer Trainer as a third man. Training by the Trainer shall emphasize:
 - QI & TI Radioactive Materials License
 - QI & TI Operating and Emergency Procedures
 - DEQ and 10 CFR
- 3.2.3. The new employee will then be given a test on Radiation Safety, which must be completed with a grade of 70% or better. Any areas that were missed on the examination will be discussed immediately with the RSO. If a score 70% is not made, retesting is required after additional training is given as determined by the RSO.
- 3.2.4. Demonstration, by practical exam, of competency in the use of radiation exposure devices, sealed sources, related handling tools, survey instruments, film or TLD badges, dosimeters, and all other safety equipment used by QI & TI. The exam is to be administered and graded by the RSO.
- 3.2.5. The individual will be given a copy of this procedure.
- 3.2.6. QI & TI will not permit any individual to act as a radiographer until the individual—
 - Has received training in the subjects regulations, in addition to a minimum of 2 months of on-the-job training, and is certified through a radiographer certification program by a certifying entity. QI & TI may allow an individual who has not met the requirements, to act as a radiographer after the individual has received training in the subjects outlined and demonstrated an understanding of these subjects by successful completion of a written examination that was previously submitted to and approved by the Commission.
- 3.2.6.1. In addition, QI & TI will not permit any individual to act as a radiographer until the individual—
 - Has received copies of and instruction in the requirements described in NRC regulations contained in this part; in § 30.7, 30.9, and 30.10 of this chapter; in the applicable sections of 10 CFR parts 19 and 20, of this chapter, in applicable DOT regulations as referenced in 10 CFR part 71, in the NRC license(s) under which the radiographer will perform industrial radiography, and QI & TI's operating and emergency procedures;
 - Has demonstrated understanding of the QI & TI's license and operating and emergency procedures by successful completion of a written or oral examination covering this material.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- Has received training in the use of the QI & TI's radiographic exposure devices, sealed sources, in the daily inspection of devices and associated equipment, and in the use of radiation survey instruments.
 - Has demonstrated understanding of the use of radiographic exposure devices, sources, survey instruments and associated equipment in by successful completion of a practical examination covering this material.
- 3.2.7. QI & TI will not permit any individual to act as a radiographer's assistant until the individual—
- Has received copies of and instruction in the requirements described in DEQ and NRC regulations contained in this part, in §§ 30.7, 30.9, and 30.10 of this chapter, in the applicable sections of 10 CFR parts 19 and 20 of this chapter, in applicable DOT regulations as referenced in 10 CFR part 71, in the NRC license(s) under which the radiographer's assistant will perform industrial radiography, and the licensee's operating and emergency procedures;
 - Has developed competence to use, under the personal supervision of the radiographer, the radiographic exposure devices, sealed sources, associated equipment, and radiation survey instruments that the assistant will use; and
 - Has demonstrated understanding of the instructions provided under of this section by successfully completing a written test on the subjects covered and has demonstrated competence in the use of hardware and successful completion of a practical examination on the use of such hardware.
- 3.2.8. QI & TI will provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.
- 3.2.9. The RSO or designee shall conduct an inspection program of the job performance of each radiographer and radiographer's assistant to ensure that the Commission's regulations, license requirements, and the applicant's operating and emergency procedures are followed. The inspection program must:
- Include observation of the performance of each radiographer and radiographer's assistant during an actual industrial radiographic operation, at intervals not to exceed 6 months; and
 - Provide that, if a radiographer or a radiographer's assistant has not participated in an industrial radiographic operation for more than 6 months since the last inspection, the radiographer must demonstrate knowledge of the training requirements and the radiographer's assistant must re-demonstrate knowledge of the training requirements by a practical examination before these individuals can next participate in a radiographic operation.
 - The Commission may consider alternatives in those situations where the individual serves as both radiographer and RSO.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- In those operations where a single individual serves as both radiographer and RSO, and performs all radiography operations, an inspection program is not required.

3.2.10. QI &TI will maintain records of the above training to include certification documents, written and practical examinations, refresher safety training and inspections of job performance in accordance with § 34.79.

3.2.11. QI &TI will include the following subjects required:

- Fundamentals of radiation safety including—
- Characteristics of gamma radiation;
- Units of radiation dose and quantity of radioactivity;
- Hazards of exposure to radiation;
- Levels of radiation from licensed material; and
- Methods of controlling radiation dose (time, distance, and shielding);
- Radiation detection instruments including—
- Use, operation, calibration, and limitations of radiation survey instruments;
- Survey techniques; and
- Use of personnel monitoring equipment;
- Equipment to be used including—
- Operation and control of radiographic exposure equipment, remote handling equipment, and storage containers, including pictures or models of source assemblies (pigtailed).
- Storage, control, and disposal of licensed material; and
- Inspection and maintenance of equipment.
- The requirements of pertinent Federal regulations; and

3.3. Radiographers Requirements

The following training program shall be completed by all persons who are not determined to be radiographers by possession of an Industrial Radiographic Operations Certification Card issued by an authority authorized by the 10CFR 34.43 and DEQ:

3.3.1. The individual must have met all the requirements for a Radiographer Trainee.

3.3.2. The individual must have completed at least 200 hours of on-the-job training, under the direct supervision of a Radiographer Trainer.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 3.3.3. The individual must properly record the hours of active participation in radiographic operations on a training form and submit to the RSO for review.
- 3.3.4. Demonstration, by practical exam, of competency in the use of radiation exposure devices, sealed sources, related handling tools, survey instruments, film or TLD badges, dosimeters, and all other safety equipment used by QI & TI. The exam is to be administered and graded by the RSO.
- 3.3.5. After the person has passed the exam given by the testing body, a certifying verification card shall be issued as proof of passing the exam. The card must be carried at all times while performing radiographic operations.

3.4. Previous Radiographers Requirements

- 3.4.1. Verification of previous radiographer designation shall be made by obtaining a copy of the person's Industrial Radiography I.D. card and checking with the certifying body to ensure authenticity. A training form shall be submitted to DEQ for approval and review.
- 3.4.2. The individual will be given a copy of this procedure.
- 3.4.3. The person will then be required to successfully complete a Radiation Safety Test with a grade of 70% or better.
- 3.4.4. Demonstration, by practical exam, of competency in the use of radiation exposure devices, sealed sources, related handling tools, survey instruments, film or TLD badges, dosimeters, and all other safety equipment used by QI & TI. The exam is to be administered and graded by the RSO.

3.5. Radiographer Trainer Requirements:

- 3.5.1. Meet the requirements set forth in 3.2 and/or 3.3, whichever is applicable.
- 3.5.2. The individual must have at least one year of documented experience as a Radiographer.
- 3.5.3. The person will be specifically designated on the license as a Radiographer Trainer by submitting a CFR10 34.43, DEQ and a letter requesting such designation on the license by the RSO.

3.6. Periodic Refresher Training

- 3.6.1. The RSO shall hold periodic refresher meetings with all personnel involved in radiography. These meetings shall be held at intervals not to exceed three months and shall have documented evidence of subject matter covered and personnel attending. These meetings are intended to keep all radiographic personnel abreast of the most current methods in the field and to ensure that the radiation safety program operates in compliance with this manual and all regulations. Topics to be covered in the meeting shall include, Louisiana Regulations for Control of Radiation, radiation safety procedures in field

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

operations, posting and restricting radiographic areas, calculations and boundaries, proper inspection and maintenance of equipment, violations found during previous field inspections, use and care of film badges, dosimeters, and rate alarms, and the use and care of survey instruments.

- 3.6.2. In addition, a written exam shall be given at intervals not to exceed one year on general radiation safety to ensure personnel compliance. A minimum score of 70% is required for passing.

4. Leak Testing of Sealed Sources

- 4.1. Leak testing shall be performed by the RSO or his designee as per 10 CFR 30, 10 CFR 34.
- 4.2. Upon receipt of the leak test kit, all kit paperwork shall be filled out. The following are general procedures for a leak test. Unless changed by the Vendor who will be processing the test, follow the steps below:
- Dissolve the dry detergent, supplied with the kit, in a small amount of water.
 - Dampen one of the cotton swabs, supplied in the kit, in the detergent solution.
 - Wipe around the source pigtail connector and just inside source tube connector on the exposure device with the dampened swab.
 - Replace swab in plastic bag inside kit.
 - Remove the other swab in the kit and repeat the above operation with the swab dry, instead of dampened.
 - Survey the leak test kit with a survey meter. If a reading in excess of background is detected, DO NOT MAIL the kit; instead contact the kit supplier for additional instructions.
 - If no radiation levels, in excess of background, are detected, mail the kit to the vendor for analysis.
- 4.3. Leak testing must be performed by a licensed vendor approved by DEQ or the NRC. The main leak test vendor will be NDT Repair in Morgan City, Louisiana.
- 4.4. A copy (or proof) of the leak test shall accompany the source at all times.
- 4.5. If a leak test has not been performed on a sealed source within the last 6 month time period, the source shall not be used until this is completed.
- 4.6. Measurement of the leak-test sample is a quantitative analysis requiring that instrumentation used to analyze the sample be capable of detecting 185 Bq (0.005 microcuries) of radioactivity.
- 4.7. The replacement of any sealed source fastened to or contained in a radiographic exposure device and leak testing of any sealed source must be performed by persons authorized to do so by the NRC or an Agreement State.

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 4.8. The opening, repair, or modification of any sealed source must be performed by persons specifically authorized to do so by the Commission or an Agreement State.
- 4.9. Testing and recordkeeping requirements.
- 4.10. QITI uses a sealed source shall have the source tested for leakage at intervals not to exceed 6 months. The leak testing of the source must be performed using a method approved by the Commission or by an Agreement State. The wipe sample should be taken from the nearest accessible point to the sealed source where contamination might accumulate. The wipe sample must be analyzed for radioactive contamination. The analysis must be capable of detecting the presence of 185 Bq (0.005 microcurie) of radioactive material on the test sample and must be performed by a person specifically authorized by the Commission or an Agreement State to perform the analysis.
- 4.11. Unless a sealed source is accompanied by a certificate from the transferor that shows that it has been leak tested within 6 months before the transfer, it may not be used by the licensee until tested for leakage. Sealed sources that are in storage and not in use do not require leak testing, but must be tested before use or transfer to another person if the interval of storage exceeds 6 months.
- 4.12. Each exposure device using depleted uranium (DU) shielding and an "S" tube configuration must be tested for DU contamination at intervals not to exceed 12 months. The analysis must be capable of detecting the presence of 185 Bq (0.005 microcuries) of radioactive material on the test sample and must be performed by a person specifically authorized by the Commission or an Agreement State to perform the analysis. Should such testing reveal the presence of 185 Bq (0.005 microcuries) or more of removable DU contamination, the exposure device must be removed from use until an evaluation of the wear on the S-tube has been made. Should the evaluation reveal that the S-tube is worn through; the device may not be used again. DU shielded devices do not have to be tested for DU contamination while in storage and not in use. Before using or transferring such a device however, the device must be tested for DU contamination if the interval of storage exceeded 12 months. A record of the DU leak-test must be made in accordance with § 34.67

5. Internal Inspection

- 5.1. The RSO is responsible for verifying the following procedures are performed as a method of assuring that the radiation safety program is functioning in accordance with applicable regulations, license agreements and the QI & TI Operating and Emergency procedures. If deficiencies are noted, report them directly to the President/Owner.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 5.2. The RSO shall insure that personnel monitoring equipment is checked daily, before allowing individuals to perform radiography, to ensure they are being worn.
- 5.3. Reports shall be reviewed weekly to check for high dosimeter readings and to ensure that all surveys are being completed.
- 5.4. Unannounced Inspections shall be performed to ensure that proper procedures are being complied with and are to be performed on all radiographic personnel at intervals not to exceed 6 months. The inspections shall be documented on the Radiographic Personnel Audit Form Records of Unannounced Inspections shall be maintained by the RSO.
- 5.5. Inspection of radioactive source devices and associated equipment are to be performed by the RSO or his designee on a quarterly basis to ensure the equipment is functioning properly and in good working order.
- 5.6. A physical inventory shall be made of all radioactive material and associated equipment on a quarterly basis by the RSO or his designee.
- 5.7. Records of equipment inspections shall be maintained by the RSO for inspection by the regulatory bodies.

6. Records Management

- 6.1. The following records are to be kept in safe storage by the RSO for review by the regulatory body:
 - Utilization Log(s)
 - Personnel Exposure Records
 - Required Survey Records
 - Instrument Calibration Records
 - Inventory, Inspection, and Maintenance records
 - Training Records
 - Receipt, Transfer, and Disposal Records
 - Leak Test Records

6.2. Additional Program Records

All additional records (not mentioned above) which are required pursuant to regulatory requirements (e.g., license, regulations, procedures etc.) shall also be maintained in the office of the Radiation Safety Officer.

6.3. Record Retention

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

All records will be retained for the periods of time required in the regulations, or
As otherwise directed by the regulatory agency.

7. Quarterly Inspections, Maintenance of Equipment

7.1. Exposure Devices

The following are the steps and procedures for checking and maintaining
exposure devices on a quarterly basis:

Labels

- All required labeling shall be present.
- If necessary, replace any illegible labels.

7.1.1. Locking Mechanism

- Lock components shall be free of foreign matter and debris that would prevent operation of the device.
- If necessary, clean and lubricate the device. If this does not work, have the lock replaced before use.

7.1.2. Source Connector

- The source connector shall be straight and free of corrosion and damage.
- If necessary, have the connector replaced before use.

7.1.3. Source Outlet

- The outlet should be round and smooth, and it should have an O.D. that matches the I.D. of the source tube connector.
- If damage is too extensive, repair or replacement is necessary.

7.1.4. Drive Cable and Pigtail Connector

- The drive cable should be free from visible damage.
- The cable should be flexible.
- The pigtail connector should be free from excessive wear.
- If necessary, the drive cable may be cleaned with a recommended solvent.
- If damage is too extensive, repair or replacement is necessary.
- Powder type lubricants should not be used on the drive cable.

7.2. Crank-out assembly

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- The gear assembly should be free of foreign materials
- The gear assemble should be complete and functional.
- If necessary, lubricant can be used to grease the gear.
- If damage is too extensive, repair or replacement is necessary.

7.3. Drive Cable Conduit

- The conduit should be free of crimps and cuts and not severely kinked. The ends should be in good condition.
- If the lining has been damaged, it must be replaced.
- If it is just the outer rubber coating cut, it can be patched with an industrial grade tape.

7.4. Source Guide Tube

- Source (guide) tube should be free from crimps and cuts that would prevent normal operation of the tube.
- The interior should be free of foreign material. The brass outer fittings should be solidly connected to the tube and free from visible wear or damage.
- If necessary, compressed air should be used to blow material out of the tube. If the tube has cuts or crimps, it must be repaired by an approved vendor. If the ends are damaged, they must be replaced.

7.5. Maintenance activities of radioactive devices and/or associated equipment shall be documented by the RSO. Maintenance records shall be kept for review.

7.6. QI & TI shall perform visual and operability checks on survey meters, radiographic exposure devices, transport and storage containers, associated equipment and source changers before use on each day the equipment is to be used to ensure that the equipment is in good working condition, that the sources are adequately shielded, and that required labeling is present. Survey instrument operability must be performed using check sources or other appropriate means. If equipment problems are found, the equipment must be removed from service until repaired.

7.7. QI & TI shall have written procedures for:

- Inspection and routine maintenance of radiographic exposure devices, source changers, associated equipment, transport and storage containers, and survey instruments at intervals not to exceed 3 months or before the first use thereafter to ensure the proper functioning of components important to safety. Replacement components shall meet design specifications. If equipment problems are found, the equipment must be removed from service until repaired.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- Inspection and maintenance necessary to maintain the Type B packaging used to transport radioactive materials. The inspection and maintenance program must include procedures to assure that Type B packages are shipped and maintained in accordance with the certificate of compliance or other approval.

7.8 Records of equipment problems and of any maintenance performed must be made in accordance with DEQ and § 34.73.

8. Source Exchange

- 8.1. QI & TI source exchanges or replacements shall be performed by an approved source manufacturer/vendor.
- 8.2. All documents associated with a source exchange shall be kept by the RSO for review.
- 8.3. The maximum exposure rate limits for storage containers and source changer are 2 millisieverts (200 millirem) per hour at any exterior surface, 0.1 millisieverts (10 millirems) per hour at 1 meter from any exterior surface with the sealed source in the shielded position.
- 8.4. Each radiographic exposure device must have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. The exposure device and/or its container must be kept locked (and if a keyed-lock, with the key removed at all times) when not under the direct surveillance of a radiographer or a radiographer's assistant except at permanent radiographic installations as stated in DEQ & § 34.51. In addition, during radiographic operations the sealed source assembly must be secured in the shielded position each time the source is returned to that position.
- 8.5. Each sealed source storage container and source changer must have a lock or outer locked container designed to prevent unauthorized or accidental removal of the sealed source from its shielded position. Storage containers and source changers must be kept locked (and if a keyed-lock, with the key removed at all times) when containing sealed sources except when under the direct surveillance of a radiographer or a radiographer's assistant.
As per DEQ and 34.23

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

9. Occupational Dosimeter

- 9.1 QI & TI will provide each employee a film or TLD dosimetry that been accredited under the NVLAP operated by the National Institute of standards and Technology (NIST).
- 9.2 Dose Limit for Radiation worker 10 CFR 20 1201 Eyes 0.15 Sv (15 Rems) Skin .050 SV (50 Rems) Elbow to hands 0.50 Sv (Rems) Knees to feet 0.50 Sv 50 Rems. Total effective dose equivalent TEDE (Whole Body) 0.05 (5 Rems).
- 9.3 QI & TI will not permit any individual to act as a radiographer or a radiographers assistant unless, at all times during radiographic operations each individual wears on the trunk of the body, a combination of a direct-reading dosimeter (pocket dosimeter or electronic personal dosimeter), an operating alarm ratemeter, and either a film badge or a TLD.
At permanent radiography installations where other appropriate alarming or warning devices are in routing use, wearing an alarm rate is not required. The pocket dosimeter will have range from zero to mSv (200 mrems), most be recharged at the start of each shift, and must be checked for correct response to radiation at intervals not to exceed 12 months. Alarm ratemeters will be preset to give an alarm signal at a dose rate of 5 mSv (500 mrems/hr) and must be calibrated for correct response at intervals not exceed 12 months
- Film badges must be replaced at intervals not to exceed 1 month and TLDs must be replaced at intervals not to exceed 3 months.

10. Public Dose

- 10.1 QI & TI will ensure that radiography devices will be used, transported, and stored in such a way that members of the public will not receive more than 1mSV (100 mrem) in a year, and the dose from licensed operations in any unrestricted area wii not exceed 0.02 mSv (2mrem) in any one hour as per 10 CFR 20.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 10.2 Control and maintain constant surveillance over devices that are not in storage and secure stored devices from unauthorized removal or use.
- 10.3 The use of collimators or limiting the direction of exposures will reduce the radiation exposure of personnel and members of the public. Alternatively, the remote location of and access to a permanent radiographic installation could prevent members of the public from receiving 1 mSv (100 mrem) in a year.

11. Field and Temporary Jobsite

- 11.1 QI & TI will ensure that radiographic operations are performed outside a permanent radiographic installation. At least two qualified personnel must be present. At least one of the individuals must be a radiographer; the other may be another radiographer or a radiographer's assistant. Both individuals must maintain constant surveillance of the operations and be capable of providing immediate assistance to prevent unauthorized entry to the restricted Area. Operating procedures must comply with the two-man rule for radiographic operations at any locations other than permanent radiographic facilities as per DEQ and CFR 20 and CFR 34.

Radiographic personnel are required to maintain continuous direct visual surveillance of operations to protect against unauthorized entry to the high radiation area during radiographic operation. Radiographic personnel will be instructed to keep the perimeter of the restricted area under continuous surveillance to prevent unnecessary exposure of individuals.

- 11.2 All areas where radiographic operations are conducted will be posted of the radiation areas and high radiation areas.
- 11.3 It is acceptable to post the perimeter of the restricted area rather than the perimeter of the radiation area. Personnel shall be instructed to post "Caution Radiation Area" signs at the point where radiation levels have been calculated to reach 0.02 mSv (2mrem) in any one hour. A confirming survey during the first exposure of the source shall be conducted to confirm the location of the boundary and any necessary adjustments will be made.
- 11.4 The perimeter of the high radiation area must be posted with a "Caution High Radiation Area" signs at the point where radiation levels have been calculated the 1 mSv (100 mrem) in any one hour. A confirmation survey of the high radiation area perimeter should not be conducted, since such a survey could lead to unnecessary exposure of personnel.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 11.5 Surveillance of the restricted area at facilities with multiple levels access points, or where members of the public are close to the radiographic operations (boilers, commercial manufacturing plants, or power plants during outages) 3 man crews or more will be used to insure the safety of the public.

12. Radiation survey instruments.

- 12.1 The licensee shall keep sufficient calibrated and operable radiation survey instruments at each location where radioactive material is present to make the radiation surveys required by this part and by 10 CFR part 20 of this chapter. Instrumentation required by this section must be capable of measuring a range from 0.02 millisieverts (2 millirems) per hour through 0.01 sievert (1 rem) per hour.
- 12.3 The licensee shall have each radiation survey instrument required under paragraph (a) of this section calibrated--
- 12.4 At intervals not to exceed 6 months and after instrument servicing, except for battery changes;
- 12.5 For linear scale instruments, at two points located approximately one-third and two-thirds of full-scale on each scale; for logarithmic scale instruments, at mid-range of each decade, and at two points of at least one decade; and for digital instruments, at 3 points between 0.02 and 10 millisieverts (2 and 1000 millirems) per hour; and
- 12.6 So that an accuracy within plus or minus 20 percent of the calibration source can be demonstrated at each point checked.
- 12.7 The licensee shall maintain records of the results of the instrument calibrations in accordance with § 34.65.

13. Labeling, storage, and transportation.

- 13.1 QI & TI will not use a source changer or a container to store licensed material unless the source changer or the storage container has securely attached to it a durable, legible, and clearly visible label bearing the standard trefoil radiation caution symbol conventional colors, i.e., magenta, purple or black on a yellow background, having a minimum diameter of 25 mm, and the wording:

CAUTION*
RADIOACTIVE MATERIAL
NOTIFY CIVIL AUTHORITIES (or "NAME OF COMPANY")
* _____ or "DANGER"

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

13.2 QI & TI will not transport licensed material unless the material is packaged, and the package is labeled, marked, and accompanied with appropriate shipping papers in accordance with regulations set out in 10 CFR part 71.

- Regulation as per DOT
- Packaging 49 CFR part 173 subpart A,B and I
- Marking and labeling 49 CFR part 172 subpart F
- Shipping papers and emergency information 49 CFR part 172 subparts C and G.
- Hazardous material employee training 49 CFR part 172 subpart H.
- Security plan 49 CFR 172 subpart I.
- Hazardous material shipper/carrier registration 49 CFR part 107 subpart G.
- Public Highway 49 CFR part 177
- Rail 49CFR part 174 subparts A through D and K
- Air 49 CFR part 175
- Vessel 49 CFR part 176 Subparts A through F and M

13.3 Locked radiographic exposure devices and storage containers must be physically secured to prevent tampering or removal by unauthorized personnel. QI & TI will store licensed material in a manner which will minimize danger from explosion or fire.

13.4 QI & TI will lock and physically secure the transport package containing licensed material in the transporting vehicle to prevent accidental loss, tampering, or unauthorized removal of the licensed material from the vehicle.

14. Operating and emergency procedures.

14.1 Operating and emergency procedures must include, as a minimum, instructions in the following:

- Appropriate handling and use of licensed sealed sources and radiographic exposure devices so that no person is likely to be exposed to radiation doses in excess of the limits established in 10 CFR part 20 of this chapter "Standards for Protection Against Radiation";
- Methods and occasions for conducting radiation surveys;
- Methods for controlling access to radiographic areas;
- Methods and occasions for locking and securing radiographic exposure devices, transport and storage containers and sealed sources;
- Personnel monitoring and the use of personnel monitoring equipment;
- Transporting sealed sources to field locations, including packing of radiographic exposure devices and storage containers in the vehicles,

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

placarding of vehicles when needed, and control of the sealed sources during transportation (refer to 49 CFR parts 171-173);

- The inspection, maintenance, and operability checks of radiographic exposure devices, survey instruments, transport containers, and storage containers;
- Steps that must be taken immediately by radiography personnel in the event a pocket dosimeter is found to be off-scale or an alarm rate meter alarms unexpectedly.
- The procedure(s) for identifying and reporting defects and noncompliance, as required by 10 CFR part 21 of this chapter;
- The procedure for notifying proper persons in the event of an accident;
- Minimizing exposure of persons in the event of an accident;
- Source recovery procedure if licensee will perform source recovery;
- Maintenance of records.

14.2 QI & TI shall maintain copies of current operating and emergency procedures in accordance with §§ 34.81 and 34.89.

15. Personnel monitoring.

15.1 QI & TI will not permit any individual to act as a radiographer or a radiographer's assistant unless, at all times during radiographic operations, each individual wears, on the trunk of the body, a direct reading dosimeter, an operating alarm rate meter, and a personnel dosimeter that is processed and evaluated by an accredited National Voluntary Laboratory Accreditation Program (NVLAP) processor. At permanent radiography installations where other appropriate alarming or warning devices are in routine use, the wearing of an alarming rate meter is not required.

- Pocket dosimeters must have a range from zero to 2 millisieverts (200 millirems) and must be recharged at the start of each shift. Electronic personal dosimeters may only be used in place of ion-chamber pocket dosimeters
- Each personnel dosimeter must be assigned to and worn only by one individual.
- Film badges must be replaced at periods not to exceed one month and other personnel dosimeters processed and evaluated by an accredited NVLAP processor must be replaced at periods not to exceed three months.
- After replacement, each personnel dosimeter must be processed as soon as possible.

15.2 Direct reading dosimeters such as pocket dosimeters or electronic personal dosimeters, must be read and the exposures recorded at the beginning and end of each shift, and records must be maintained in accordance with DEQ and § 34.83.

15.3 Pocket dosimeters, or electronic personal dosimeters, must be checked at periods not to exceed 12 months for correct response to radiation, and records

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

must be maintained in accordance with DEQ and § 34.83. Acceptable dosimeters must read within plus or minus 20 percent of the true radiation exposure.

- 15.4 If an individual's pocket chamber is found to be off-scale, or if his or her electronic personal dosimeter reads greater than 2 millisieverts (200 millirems), and the possibility of radiation exposure cannot be ruled out as the cause, the individual's personnel dosimeter must be sent for processing within 24 hours. In addition, the individual may not resume work associated with licensed material use until a determination of the individual's radiation exposure has been made. This determination must be made by the RSO or the RSO's designee. The results of this determination must be included in the records maintained in accordance with DEQ and § 34.83.
- 15.5 If the personnel dosimeter that is required by paragraph (a) of this section is lost or damaged, the worker shall cease work immediately until a replacement personnel dosimeter meeting the requirements in paragraph (a) is provided and the exposure is calculated for the time period from issuance to loss or damage of the personnel dosimeter. The results of the calculated exposure and the time period for which the personnel dosimeter was lost or damaged must be included in the records maintained in accordance with DEQ and § 34.83.
- 15.6 Dosimetry reports received from the accredited NVLAP personnel dosimeter processor must be retained in accordance with DEQ and § 34.83.
- 15.7 Each alarm rate meter must—
- Be checked to ensure that the alarm functions properly (sounds) before using at the start of each shift;
 - Be set to give an alarm signal at a preset dose rate of 5 mSv/hr (500 mrem/hr); with an accuracy of plus or minus 20 percent of the true radiation dose rate;
 - Require special means to change the preset alarm function; and
 - Be calibrated at periods not to exceed 12 months for correct response to radiation. The licensee shall maintain records of alarm rate meter calibrations in accordance with DEQ and § 34.83.

16. Radiation surveys.

16.1 QI & TI will:

- Conduct surveys with a calibrated and operable radiation survey instrument that meets the requirements of DEQ and § 34.25
- Using a survey instrument meeting the requirements of paragraph (a) of this section, conduct a survey of the radiographic exposure device and the guide tube after each exposure when approaching the device or the guide tube. The survey must determine that the sealed source has returned to its shielded position before exchanging films, repositioning the exposure head, or dismantling equipment.
- Conduct a survey of the radiographic exposure device with a calibrated radiation survey instrument any time the source is exchanged and whenever a

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 20.1 Each licensee shall maintain records showing the receipts and transfers of sealed sources and devices using DU for shielding and retain each record for 3 years after it is made.
- 20.2 These records must include the date, the name of the individual making the record, radionuclide, number of Becquerel's (curies) or mass (for DU), and manufacturer, model, and serial number of each sealed source and/or device, as appropriate.

21. Records of radiation survey instruments.

- 21.1 Each licensee shall maintain records of the calibrations of its radiation survey instruments that are required under DEQ and § 34.25 and retain each record for 3 years after it is made.

22. Records of leak testing of sealed sources and devices containing depleted uranium.

- 22.1 Each licensee shall maintain records of leak test results for sealed sources and for devices containing DU. the results must be stated in units of Becquerel's (microcuries). The licensee shall retain each record for 3 years after it is made or until the source in storage is removed.

23. Utilization logs.

- 23.1 Each licensee shall maintain utilization logs showing for each sealed source the following information:
- A description, including the make, model, and serial number of the radiographic exposure device or transport or storage container in which the sealed source is located;
 - The identity and signature of the radiographer to whom assigned; and
 - The plant or site where used and dates of use, including the dates removed and returned to storage.

- 23.2 QI & TI will retain the logs for inspection for 3 years after the log is made.

24. Records of inspection and maintenance of radiographic exposure devices, transport and storage containers, associated equipment, source changers, and survey instruments.

- 24.1 Each licensee shall maintain records specified in DEQ and § 34.31 of equipment problems found in daily checks and quarterly inspections of radiographic exposure devices, transport and storage containers, associated equipment, source changers, and survey instruments; and retain each record for 3 years after it is made.

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- 24.2 The record must include the date of check or inspection, name of inspector, equipment involved, any problems found, and what repair and/or maintenance, if any, was done.

25. Records of alarm system and entrance control checks at permanent radiographic installations.

- 25.1 QI & TI will maintain records of alarm system and entrance control device tests required under DEQ and § 34.33 and retain each record for 3 years after it is made.

26. Records of training and certification.

- 26.1 QI & TI will maintain the following records (of training and certification) for 3 years after the record is made:
- Records of training of each radiographer and each radiographer's assistant. The record must include radiographer certification documents and verification of certification status, copies of written tests, dates of oral and practical examinations, and names of individuals conducting and receiving the oral and practical examinations; and
 - Records of annual refresher safety training and semi-annual inspections of job performance for each radiographer and each radiographer's assistant. The records must list the topics discussed during the refresher safety training, the dates the annual refresher safety training was conducted, and names of the instructors and attendees. For inspections of job performance, the records must also include a list showing the items checked and any non-compliance observed by the RSO.

27. Copies of operating and emergency procedures.

- 27.1 Each licensee shall maintain a copy of current operating and emergency procedures until the Commission terminates the license. Superseded material must be retained for 3 years after the change is made.

28. Records of personnel monitoring Procedures.

- 28.1 QI & TI will keep the following exposure records specified in DEQ and § 34.47:

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- Direct reading dosimeter readings and yearly operability checks required for 3 years after the record is made,
- Records of alarm rate meter calibrations for 3 years after the record is made.
- Personnel dosimeter results received from the accredited NVLAP processor until the Commission terminates the license.
- Records of estimates of exposures as a result of: off-scale personal direct reading dosimeters, or lost or damaged personnel dosimeters until the Commission terminates the license.

29. Records of radiation surveys.

- 29.1 QI & TI will maintain a record of each exposure device survey conducted before the device is placed in storage as specified in § 34.49(c), if that survey is the last one performed in the workday. Each record must be maintained for 3 years after it is made.

30. Form of records.

- 30.1 Each record required by this part must be legible throughout the specified retention period. The record may be the original or a reproduced copy or a microform provided that the copy or microform is authenticated by authorized personnel and that the microform is capable of reproducing a clear copy throughout the required retention period. The record may also be stored in electronic media with the capability for producing legible, accurate, and complete records during the required retention period. Records, such as letters, drawings, and specifications, must include all pertinent information, such as stamps, initials, and signatures. The licensee shall maintain adequate safeguards against tampering with and loss of records.

31. Location of documents and records.

- 31.1 QI & TI will maintain copies of records required by this part and other applicable parts of this chapter at the location specified in DEQ and § 34.13(k).
- 31.2 QI & TI will also maintain copies of the following documents and records sufficient to demonstrate compliance at each applicable field station and each temporary jobsite;
- The license authorizing the use of licensed material;

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

- A copy of DEQ and 10 CFR parts 19, 20, and 34 of NRC regulations;
- Utilization records for each radiographic exposure device dispatched from that location as required by DEQ and § 34.71.
- Records of equipment problems identified in daily checks of equipment as required by DEQ and § 34.73(a);
- Records of alarm system and entrance control checks required by DEQ and § 34.75, if applicable;
- Records of direct reading dosimeters such as pocket dosimeter and/or electronic personal dosimeters readings as required by DEQ and § 34.83;
- Operating and emergency procedures required by DEQ and § 34.81;
- Evidence of the latest calibration of the radiation survey instruments in use at the site, as required by DEQ and § 34.65;
- Evidence of the latest calibrations of alarm rate meters and operability checks of pocket dosimeters and/or electronic personal dosimeters as required by DEQ and § 34.83;
- Latest survey records required by UDEQ and § 34.85;
- The shipping papers for the transportation of radioactive materials required by DEQ and § 71.5 of this chapter; and
- When operating under reciprocity pursuant to DEQ and § 150.20 of this chapter, a copy of the Agreement State license authorizing the use of licensed materials.

32. Records of quarterly inventory.

- 32.1 QI & TI will maintain records of the quarterly inventory of sealed sources and of devices containing depleted uranium as required by DEQ and § 34.29 and retain each record for 3 years after it is made.
- 33.2 The record must include the date of the inventory, name of the individual conducting the inventory, radionuclide, number of becquerels (curies) or mass (for DU) in each device, location of sealed source and/or devices, and manufacturer, model, and serial number of each sealed source and/or device, as appropriate.

NOTIFICATIONS

33. Notifications

- 33.1 In addition to the reporting requirements specified in DEQ and § 30.50 and under other sections of this chapter, such as DEQ and § 21.21, each licensee shall send a written report to the NRC's Office of Federal and State Materials and Environmental Management Programs, by an appropriate method listed in DEQ and § 30.6(a) of this chapter, within 30

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

days of the occurrence of any of the following incidents involving radiographic equipment:

- Unintentional disconnection of the source assembly from the control cable;
- Inability to retract the source assembly to its fully shielded position and secure it in this position; or
- Failure of any component (critical to safe operation of the device) to properly perform its intended function;

33.2 QI & TI will include the following information in each report submitted and in each report of overexposure submitted under DEQ and 10 CFR 20.2203 which involves failure of safety components of radiography equipment:

- A description of the equipment problem;
- Cause of each incident, if known;
- Name of the manufacturer and model number of equipment involved in the incident;
- Place, date, and time of the incident;
- Actions taken to establish normal operations;
- Corrective actions taken or planned to prevent recurrence; and
- Qualifications of personnel involved in the incident.

33.3 QI & TI, when conducting radiographic operations or storing radioactive material at any location not listed on the license for a period in excess of 180 days in a calendar year, shall notify the appropriate DEQ and NRC regional office listed in § 30.6(a)(2) prior to exceeding the 180 days.

34. Permanent radiographic installations.

34.1 Each entrance that is used for personnel access to the high radiation area in a permanent radiographic installation must have either:

- An entrance control of the type described in § 20.1601(a)(1) of this chapter that reduces the radiation level upon entry into the area, or
- Both conspicuous visible and audible warning signals to warn of the presence of radiation. The visible signal must be actuated by radiation whenever the source is exposed. The audible signal must be actuated when an attempt is made to enter the installation while the source is exposed.

34.2 The alarm system must be tested for proper operation with a radiation source each day before the installation is used for radiographic operations. The test must include a check of both the visible and audible signals. Entrance control devices that reduce the radiation level upon entry must be tested monthly. If

Quality Inspection & Testing, Inc.

ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

an entrance control device or an alarm is operating improperly, it must be immediately labeled as defective and repaired within 7 calendar days. The facility may continue to be used during this 7-day period, provided QI & TI implements the continuous surveillance requirements of DEQ and § 34.51 and uses an alarming rate meter. Test records for entrance controls and audible and visual alarm must be maintained in accordance with DEQ and § 34.75.

35. Background checks

35.1 All employees at QI & TI will have a background check. Background check will include but not limited to

- Fingerprinting
- Previous employers
- Previous DOT drug testing
- Criminal records
- References
- Local law enforcement
- Pre- employment drug testing and Alcohol test

36. Vehicles while carrying radioactive material

36.1 All QI & TI radiographers, Trainer/Radiographers who have been cleared for unescorted access will be responsible for the following when on out of town project.

- The radiographer will be responsible for his/her vehicle will on out of town project.
- No vehicle shall be used for any other purpose than for work related items only.
- Truck shall be locked and source secured after any work.
- Radiographer will be responsible for keys at all times.
- No one that has not been cleared for unescorted access will be permitted to drive while source is in vehicle.
- Should anyone have problems with these rules, responsible person shall call the RSO.

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

37. Vehicle Portable Storage Vaults

37.1 QI& TI portable storage vaults will have minimum of two independent locks, along with an alarm system.

- The first lock will be the outer door with a dead bolt system.
- The second lock will be inside the darkroom where the camera will be stored
- The internal vault will have a padlock in place
- Additional third lock if necessary
- Alarm system at door contacts, a rear door contact and a mercury switch system and kill switch system to disable the vehicle.
- Vehicles have GPS system to monitor vehicles daily

38. Source disposal

38.1 Source Disposal and information required for disposal

- Sources disposal will be taken to Source production and QSA for disposal
- Disposal records will be kept for 3 years
- Device SN
- Source SN
- Date
- Isotope
- Activity
- Leak Test
- Survey at Surface
- Survey at 1 meter
- Inspected and disposed by

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

Waste

All disposals of Radioactive Materials will be disposed by

QSA Global
6765 Langley Drive
Baton Rouge, La 70809

Or

Source Production & Equipment
113 Teal St.
St. Rose, La 70087

All records will be retained as per section in administrative procedure for radiographic operations section 38.1

Quality Inspection & Testing, Inc.
ADMINISTRATIVE PROCEDURE FOR RADIOGRAPHIC OPERATIONS

Letters sent by mail receipt

Lauren Hayes

From: UPS Quantum View <auto-notify@ups.com>
Sent: Thursday, December 27, 2012 9:14 AM
To: Lauren Hayes
Subject: UPS Delivery Notification, Tracking Number 1Z170A040195061536



UPS My ChoiceSM can help you avoid missed home deliveries.

[Learn More](#)

UPS MY CHOICESM

TIRED OF GETTING THIS?



Sign up now

***Do not reply to this e-mail. UPS and Quality Inspection & Testing will not receive your reply.

At the request of Quality Inspection & Testing, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1Z170A040195061536

Delivery Date / Time: 27-December-2012 / 8:55 AM

Delivery Location: OFFICE

Signed by: WILLIAMS

Shipment Detail

Ship To:

Michael Vasquez
Materials Licensing Branch
1600 E LAMAR BLVD
ARLINGTON
TX
76011
US

Number of Packages: 1

UPS Service: NEXT DAY AIR

Shipment Type: Letter

© 2012 United Parcel Service of America, Inc. UPS, the UPS brandmark, and the color brown are trademarks of United Parcel Service of America, Inc. All rights reserved.

For more information on UPS's privacy practices, refer to the UPS Privacy Policy.
Please do not reply directly to this e-mail. UPS will not receive any reply message.
For questions or comments, visit [Contact UPS](#).

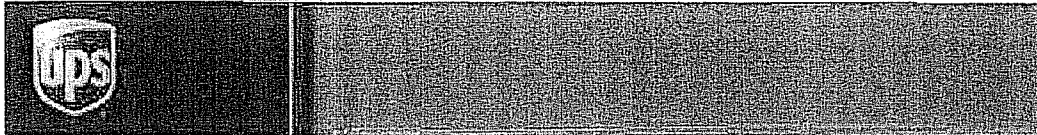
This communication contains proprietary information and may be confidential. If you are not the intended recipient, the reading, copying, disclosure or other use of the contents of this e-mail is strictly prohibited and you are instructed to please delete this e-mail immediately.

[Privacy Notice](#)

[Contact UPS](#)

Lauren Hayes

From: UPS Quantum View <auto-notify@ups.com>
Sent: Monday, December 03, 2012 8:53 AM
To: Lauren Hayes
Subject: UPS Delivery Notification, Tracking Number 1Z170A040191812982





UPS My Choice® can help you avoid missed home deliveries.

[Learn More](#)

UPS MY CHOICE™

TIRED OF GETTING THIS?



 [Sign up now](#)

***Do not reply to this e-mail. UPS and Quality Inspection & Testing will not receive your reply.

At the request of Quality Inspection & Testing, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1Z170A040191812982
Delivery Date / Time: 03-December-2012 / 8:30 AM

Delivery Location: OFFICE
Signed by: WILLIAMS

Shipment Detail

Ship To:
Michael Vasquez
Materials Liscensing Branch
1600 E LAMAR BLVD
ARLINGTON
TX
76011
US

Number of Packages: 1
UPS Service: NEXT DAY AIR
Shipment Type: Letter

© 2012 United Parcel Service of America, Inc. UPS, the UPS brandmark, and the color brown are trademarks of United Parcel Service of America, Inc. All rights reserved.
For more information on UPS's privacy practices, refer to the UPS Privacy Policy.
Please do not reply directly to this e-mail. UPS will not receive any reply message.
For questions or comments, visit Contact UPS.

This communication contains proprietary information and may be confidential. If you are not the intended recipient, the reading, copying, disclosure or other use of the contents of this e-mail is strictly prohibited and you are instructed to please delete this e-mail immediately.

[Privacy Notice](#)
[Contact UPS](#)

Lauren Hayes

From: UPS Quantum View <auto-notify@ups.com>
Sent: Friday, November 30, 2012 10:23 AM
To: Lauren Hayes
Subject: UPS Exception Notification, Tracking Number 1Z170A040191812982



Discover more about
UPS:
[Visit www.ups.com](http://www.ups.com)
[Sign Up For Additional](#)
[E-Mail From UPS](#)
[Read Company Online](#)

At the request of Quality Inspection & Testing, this notice alerts you delivery of the following shipment has been rescheduled.

Important Delivery Information

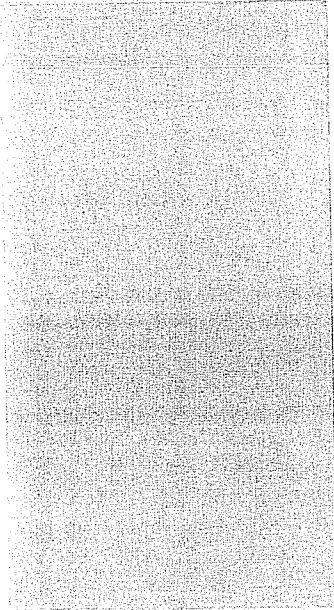
Tracking Number: 1Z170A040191812982

Rescheduled Delivery Date: 03-December-2012

Exception Reason: THE RECEIVER HAS MOVED.
UPS ATTEMPTING TO LOCATE
RECEIVER TO COMPLETE
DELIVERY, NO DELIVERY WAS
MADE

Shipment Detail

Ship To:
Michael Vasquez
Materials Liscensing Branch
Suite 400
612 E. Lamar Boulevard,
US Nuclear Regulatory Comm, Reg IV
ARLINGTON
TX
76011
US
UPS Service: NEXT DAY AIR
Shipment Type: Letter



This e-mail contains proprietary information and may be confidential. If you are not the intended recipient of this e-mail, you are hereby notified that any dissemination, distribution or copying of this message is strictly prohibited. If you received this message in error, please delete it immediately.

This e-mail was automatically generated by UPS e-mail services at the shipper's request. Any reply to this e-mail will not be received by UPS or the shipper. Please contact the shipper directly if you have questions regarding the referenced shipment or you wish to discontinue this notification service.

© 2012 United Parcel Service of America, Inc. UPS, the UPS brandmark, and the color brown are trademarks of United Parcel Service of America, Inc. All rights reserved.

For more information on UPS's privacy practices, refer to the UPS Privacy Policy.
Please do not reply directly to this e-mail. UPS will not receive any reply message.
For questions or comments, visit [Contact UPS](#).

This communication contains proprietary information and may be confidential. If you are not the intended recipient, the reading, copying, disclosure or other use of the contents of this e-mail is strictly prohibited and you are instructed to please delete this e-mail immediately.

[Privacy Notice](#)
[Contact UPS](#)

Safety Culture Exams

2/28/2013

LAMCO & ASSOCIATE

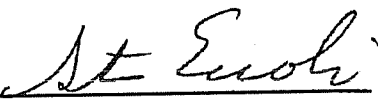


Phone: 936 271-1487

Fax: 936 271-1907

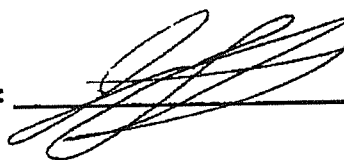
QITI MANAGERS SAFETY CULTURE TRAINING

FEBRUARY 8, 2012

INSTRUCTOR: LAURIE MCGOWEN
LAMCO & ASSOCIATE

PRINT NAME	TITLE	SIGNATURE
1 STEVE ERCOLI	G.M	
2 JASON SPANE	PREC	
3 Paul Darbonne	Oper Mgr	
4		
5		

Name of Individual verifying attendance:



SAFETY CULTURE EXAM FOR QITI

NAME: Paul Darbonne

DATE: 2-8-13 SCORE: 100

1. What is meant by a safety culture?

a set of safety rules to enforce & follow

2. How do attitudes play a role in safety culture climates?

Very important, need positive attitudes

3. List some roles of management to improve safety

Suggestion Box Keep a careful watch
Talk to employees more Do more audits
Safety Training

4. Where can you find the procedures to following case of a radiation emergency

any rig or Manager's office.

5. What should you do if you see an unsafe act taking place?

Stop it immediately.

6. Who does a safety culture start with? me

7. List some human factors that cause accidents: Lack of sleep

Improper Training Safety Training
& qualifications of personnel

8. Define ethics

a person's attitude & habits

9. Explain what is meant by willful

willingly

10. List some items/information that should be safeguarded

Radiation information - Radiation Equipment
Personnel info.

11. List some things that you have learned from this presentation

Talk to employees more & observe them
Do more safety inspections on equipment.

SAFETY CULTURE EXAM FOR QITI

NAME: JASON STONE

DATE: 2/8/13

SCORE: 100

1. What is meant by a safety culture?

TO MAINTAIN A POSITIVE, MORAL, + ETHICAL CULTURE PERTAINING TO SAFETY AND PROMOTING THE PROPER WORKING CULTURE

2. How do attitudes play a role in safety culture climates?

GOOD ATTITUDES PROMOTE A GOOD SAFETY CULTURE WHILE A BAD ATTITUDE CAN RUIN IT.

3. List some roles of management to improve safety

IMPROVE OUR OPEN DOOR POLICY, TRAIN + TEST OUR EMPLOYEES, DISCUSS ALL ISSUES + VIOLATIONS OPENLY AND HONESTLY

4. Where can you find the procedures to following case of a radiation emergency?

O+E PROCEDURES, SAFETY MANUAL

5. What should you do if you see an unsafe act taking place?

STOP THE EMPLOYEE IMMEDIATELY

6. Who does a safety culture start with?

LEADERSHIP, SUPERVISOR

7. List some human factors that cause accidents:

FATIGUE, STRESS

8. Define ethics

ALWAYS DO THE RIGHT THING

9. Explain what is meant by willful

A DELIBERATE ACT BY AN EMPLOYEE WHO KNOWS BETTER.

10. List some items/information that should be safeguarded

BACKGROUND CHECKS, T+L INFORMATION, LICENSE

11. List some things that you have learned from this presentation

NRC REQUIREMENTS, SAFETY CULTURE IMPROVEMENTS, HUMAN FACTORS INVOLVING SAFETY, MANAGEMENT + SUPERVISOR TRAINING