



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

NOV 14 1979

In Reply Refer To:
RII:RLW
52-13632-01

Texas Pipe Bending Company of Puerto Rico, Inc.
Attn: Thomas H. Noble, General Manager
Post Office Box 7103
Ponce, Puerto Rico 00731

Gentlemen:

This refers to the letter dated October 18, 1979, signed by Mr. Michael Jarrell of your office in which Mr. Jarrell took exception to all items listed in Appendix A of our letter dated August 20, 1979. Our letter of August 20, 1979, listed certain items of noncompliance found during an inspection conducted on August 1, 1979, at your Ponce facility. Another copy of our letter is enclosed for your information.

It is the opinion of this office that all items listed in Appendix A of our letter dated August 20, 1979, were valid and that Mr. Jarrell's letter in response was inadequate for the following reasons:

1. It was learned during an interview with one of your radiographers that radiographic work was performed on July 30, 1979. The radiographer would certainly know if the pocket dosimeter reading (Item A), and the survey of the exposure device (Item C) had been properly recorded.
2. Item B. If your operating procedures were adequately posted, then your radiographic personnel would certainly be able to produce a copy upon request or determine where a copy could be found.
3. During the inspector's interview with the radiographer, you entered the room, stated that all records could be found in a specific file cabinet, and instructed the radiographer to open the cabinet even if he had to "cut" it open. The radiographer was able to open the record cabinet without damage, but complete records could not be produced.
4. All items listed in Appendix A were discussed in detail with you during the exit interview. No rebuttal was offered to the inspector, except that your Radiation Safety Officer was not in Puerto Rico at that time.
5. It is the policy of this office to conduct inspections on an unannounced basis, whenever possible.

Mr. Jarrell's letter did not provide any evidence or other information that would suggest that any portion of our August 20, 1979 letter contained information that you believed to be proprietary; therefore, a copy of our August 20, 1979 letter will be placed in the NRC Public Document Room.

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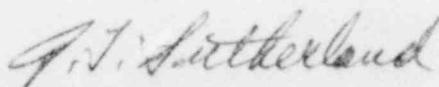
Texas Pipe Bending Company of
Puerto Rico, Inc.

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In view of the above, and in accordance with 30 CFR 2.201, we request that you supply this office, within 20 days of your receipt of this letter, a written statement or explanation in reply including: (1) corrective steps which will be taken by you, and the results achieved; (2) corrective steps which will be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

Should you have any questions concerning this letter, we will be glad to discuss them with you.

Sincerely,



J. T. Sutherland, Chief
Fuel Facility and Materials
Safety Branch

Enclosure:

Appendix A, Notice of Violation
Letter dtd. August 20, 1979 fm.
NRC to Texas Pipe Bending Company
of Puerto Rico

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