

RAMSEY

CONSTRUCTION & FABRICATING CO., INC.

FABRICATING PLANT
P.O. BOX 451
BLACKWELL, OK 74631
PH (405) 263-2853

SALES OFFICE
70 W. 5TH AVE. SUITE #314
DENVER, CO 80204
PH (303) 893-0886

HOME OFFICE & FABRICATING PLANT

P.O. BOX 30155
BILLINGS, MT 59107
PH (406) 259-9317

RAMSEY NONDESTRUCTIVE TESTING DIVISION

February 16, 1981

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

DKN - 30-17697

Gentlemen:

This response is in accordance with the provisions of Section 2.201 of the NRC "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. The following format consists of;

- A) Number of violation from Notice of Violation, contained in letter dated Feb. 11, 1981 (enclosed)
1. the corrective steps which have been taken and the results achieved
 2. the corrective steps which will be taken to avoid future violations
 3. the date when full compliance will be achieved

-
- ok* A) 1.
1. Survey instrument serial no. 3437 was calibrated February 28, 1980.
 2. Since moving to Oklahoma Ramsey NDT is able to have our survey instruments calibrated while we wait in Tulsa, Ok.. This insures that the calibration date will not exceed three month intervals.
 3. All survey instruments have been in compliance since:
serial no. 3437 - Feb. 28, 1980
serial no. 3407 - March 31, 1980 (noted as serial no. 3403 in Notice of Violation dated Feb. 11, 1981)
serial no. 3551 - April 18, 1980

- ok* B) 2.
1. I contacted Source Production & Equipment Co., Kenner, La., the firm that supplies our isotopes and exposure devices, and asked them to send their Quality Assurance Program, pursuant to 10 CFR 71.51. The president of the firm said their Q.A. Program had not been approved until Dec. 18, 1980 and would not take effect until March 1, 1981. He sent me a copy of this Q.A. Program Feb. 10, 1981.

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RAMSEY

INDUSTRIAL CONSTRUCTION
FABRICATION & REPAIR SPECIALIST



CONSTRUCTION & FABRICATING CO., INC.

FABRICATING PLANT
P.O. BOX 401
BLACKWELL, OK 74601
PH (405) 263-2803

SALES OFFICE
75 W. 6TH AVE. SUITE 4014
DENVER, CO 80204
PH (303) 893-0867

HOME OFFICE & FABRICATING PLANT

P.O. BOX 10158
BILLINGS, MT 59107
PH (406) 259-4217

RAMSEY NONDESTRUCTIVE TESTING DIVISION

2. con't.
1. I have informed S.P.E.C. that any action taken by the Nuclear Regulatory Commission concerning their Quality Assurance Program should be reported to their clients that are effected by changes in their Q. A. Program.
 2. The Q. A. Program in my possession, according to S.P.E.C. does not take effect until March 1, 1981.
- 3.
1. Personnel monitoring report for the calendar year 1979 was submitted to the Director of Inspection & Enforcement Jan. 23, 1981.
 2. The personnel monitoring report for the calendar year 1980 was also submitted to the Director of Inspection & Enforcement Jan. 23, 1981.
 3. I phoned the License Operations Evaluations Branch, Feb. 13, 1981 and was assured that the personnel monitoring report had been put on the computers records.
- 4.
1. The radiation exposure summaries of individuals terminated in 1980 was sent to the Director of Inspection & Enforcement and to those individuals terminated, Jan. 23, 1981.
 2. Forms have been made to include the employee radiation exposure, duration of exposure, area body was exposed, during their period of employment. These are to be sent to the terminated employee as soon as the monthly radiation exposure measurements are received from the firm that processes our film badges.
 3. Full compliance was achieved Jan. 23, 1981
- 5.
1. All employees were instructed to print their names and to designate where exposure devices were used in the spaces set aside for these on their Radiation Utilization Logs. Results were successfully achieved.
 2. To avoid further violations the S.P.E.C. will personally check Radiation Logs weekly to be assured of compliance.
 3. Full compliance was achieved Jan. 23, 1981.



CONSTRUCTION & FABRICATING CO., INC.

FABRICATING PLANT
P.O. BOX 401
BLACKWELL, OK 74601
PH (405) 261-2853

SALES OFFICE
10 W. 6th AVE. SUITE 4314
DENVER, CO 80204
PH (303) 493-0666

HOME OFFICE & FABRICATING PLANT

P.O. BOX 30155
BILLINGS, MT 59107
PH (406) 259-2317

RAMSEY NONDESTRUCTIVE TESTING DIVISION

of F) 6.

1. I have added three columns to the Radiation Utilization Log. The first to be checked is the survey (mr/hr) of the source tube at days end prior to locking exposure device and ending dir : surveillance of the operation. The second is a survey at the surface of the exposure device after source is locked and secured. The third is the date the source was locked and secured. Results have been successfully achieved.
2. same as above
3. Full compliance was achieved Jan. 23, 1981.

I, Steven D. Stringham, do hereby swear that the preceding response to your letter is true.

Respectfully,

Ramsey Construction &
Fabricating Co., Inc.

Steven D. Stringham
Division Manager/R.S.O.

SDS/ss
Encl. 3

NOTICE OF VIOLATION

Ramsey Construction and Fabrication
Company, Inc.

Docket No. 30-17697
License No. 35-19433-01

As a result of the inspection conducted on January 21 and January 22, 1981, and in accordance with the attached Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

- A) 1. 10 CFR 34.43(a) requires that at least one currently calibrated and operable survey instrument shall be available at the location of radiographic operations whenever radiography is being performed.

Contrary to this requirement, uncalibrated survey instruments Victoreen Model 492 Serial Nos. 3437 and 3403 were utilized in Radiographic operations conducted in the period December 27, 1979 to February 8, 1980.

This is a Severity Level IV violation. (Supplement VII.D.2)

- B) 2. 10 CFR 71.12 requires in part that a licensee who delivers for transport a type B quantity of radioactive material as specified in 49 CFR 173.394(b) shall have a quality assurance program for shipping packages whose description has been submitted to and approved by the Commission as satisfying the provisions of 10 CFR 71.51.

Contrary to this requirement, such a program had not been devised by the licensee at the time of this inspection.

This is a Severity Level IV violation. (Supplement VII.D.1)

- C) 3. 10 CFR 20.407 requires that a personnel monitoring report be submitted to the NRC within the first calendar quarter of 1980 for the total number of individuals for whom personnel monitoring was required or provided during calendar year 1979.

Contrary to this requirement, such a report was not submitted by the licensee.

This is a Severity Level VI violation. (Supplement VII.F)

- D) 4. 10 CFR 20.408(b) requires that when an individual terminates employment with a licensee that he, as well as, the U. S. Nuclear Regulatory Commission be furnished with a radiation exposure summary within 30 days after exposure or 90 days after the date of termination of employment, whichever is earlier.

Contrary to this requirement, neither the U. S. Nuclear Regulatory Commission or individuals terminated in 1980 were furnished with the above required radiation exposure summary.

This is a Severity Level VI violation. (Supplement VII.F)

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- E) 5. 10 CFR 34.27 requires in part that each licensee shall maintain current utilization logs for each sealed source containing the following information:
- (a) Identity of the Radiographer
 - (b) Plant or site where unit was used and the dates of use.

Contrary to these requirements, utilization logs maintained in time period July 20, 1980 to September 25, 1980 did not specify the radiographer identity and utilization logs maintained in the time period December 27, 1979 to December 10, 1980 did not specify the plant or site location where exposure devices were used.

This is a Severity Level VI violation. (Supplement VII.F)

- F) 6. 10 CFR 34.43(c) requires that records be maintained of radiation surveys of the radiographic exposure device as specified in 10 CFR 34.43(b) when the survey is the last survey prior to locking the exposure device and ending direct surveillance of the operation.

Contrary to this requirement, radiation surveys conducted as specified above were not recorded in time period December 22, 1979 to date of this inspection.

This is a Severity Level VI violation. (Supplement VII.F)

Pursuant to the provisions of 10 CFR 2.201, Ramsey Construction and Fabrication Company, Inc., is hereby required to submit to this office within twenty-five (25) days of the date of this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Dated February 9, 1981

Glen D. Brown
Glen D. Brown, Chief
Fuel Facility and Material
Safety Branch