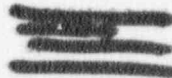


RAMSEY

CONSTRUCTION & FABRICATING CO., INC.



HOME OFFICE & FABRICATING PLANT

P.O. BOX 30156
BILLINGS, MT 59101
PH (406) 259-8317

SALES OFFICE
10 W. 6TH AVE. SUITE 4314
DENVER, CO 80204
PH (303) 693-0886

RAMSEY NONDESTRUCTIVE TESTING DIVISION

March 10, 1981

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

DE-30-116 7

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 taken and the results achieved
 2. the corrective steps that will be taken to avoid future violations
 3. the date when full compliance will be achieved

- A) 1.
1. Survey instrument serial no. 3437 was calibrated Feb. 28, 1980.
 2. To insure that no further violations occur I have completed a form to be filled out by the R.S.O. every month. The procedure instituted by this form is a survey instrument calibration check. All survey meters are listed by serial number, last date of calibration and date survey instrument must be calibrated; not to exceed 90 days from last date of calibration
 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

- 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

RAMSEY

CONSTRUCTION & FABRICATING CO., INC.

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BILLINGS MT 59107
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RAMSEY NONDESTRUCTIVE TESTING DIVISION

B) 2. con't.

2. I have informed S.P.E.C. that any action taken by the NRC concerning their Quality Assurance Program should be reported to their clients that are effected by changes in their Q.A. Program
3. The Q.A. Program in my possession, according to S.P.E.C. does not take effect until March 1, 1981.

✓ C) 3.

1. Personnel monitoring report for the calander year 1979 was submitted to the Director of Inspection & Enforcement Jan. 23, 1981.
2. To insure that no further violations occur, I have completed a form to be filled out monthly by the R.S.O. The procedure instituted by this form is the reporting of all personnel that wear film badges and the monthly accumulative exposure amount as reported to Ramsey NDT Division by the firm that processes our film badges. These monthly totals are added to that individuals preceding monthly total. At the end of the calander year the R.S.O. will compile these monthly reports in the proper form for submission to the NRC. The personnel monitoring report for the calander 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 these personnel monitoring reports had been put on the computers records.

✓ D) 4.

1. The radiation exposure summaries of individuals terminated in 1980 were sent to the Director of Inspection & Enforcement and to those individuals terminated, on Jan. 23, 1981.
2. To insure that no further violations occur, I have completed a form to be filled out by the R.S.O. The procedure instituted by this form is the reporting of an individuals radiation exposure while employed, duration of exposure, area body was exposed, and date this information was sent to the terminated employee and the NRC.
3. Full compliance was achieved Jan. 23, 1981

✓ E) 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 R.S.O. will personally check Radiator Utilization Logs weekly to be assured of compliance.
3. Full compliance was achieved Jan. 23, 1981



CONSTRUCTION & FABRICATING CO., INC.

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P.O. BOX 30156
BILLINGS, MT 59107
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RAMSEY NONDESTRUCTIVE TESTING DIVISION

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 direct surveillance of the operation. The second is a survey at the surface of the exposure device after the 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 dated, Feb. 11, 1981, is true.

Respectfully,

Ramsey Construction &
Fabricating Co., Inc.

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

SDS/ss
Encl. 3

State of Montana
County of Missoula

Walter R. Stringham, Notary Public

My Commission expires February 1982



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
671 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

11 FEB 1981

License No. 35-19433-01

PKA - 30-17697

Ramsey Construction and Fabrication Company, Inc.
Attn: Steven D. Stringham, Division Manager
N.D. Testing Division, Hwy. 11 West
Blackwell Industrial Park
Blackwell, Oklahoma 74631

Gentlemen:

This refers to the initial safety inspection conducted by Jack E. Whitten of this office on January 21, and January 22, 1981, of the activities authorized by NRC Byproduct Material License No. 35-19433-01 and to the discussion of our findings held by the inspector with members of your staff at the conclusion of the inspection.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations, and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements and observations by the inspector.

During this inspection certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing in accordance with the provisions of Section 2.201 of the NRC "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation attached to this letter.

Should you have any questions concerning this letter, please let me know.

Sincerely,

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

Enclosures:

1. Notice of Violation
2. 45 FR 56754

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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:

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)

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)

3. 10 CFR 20.407 requires that a personnel monitoring report be submitted to the NRC within the first calendar quarter of 1980 or 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)

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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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)

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 12, 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 192 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