# UNITED STATES TESTING COMPANY, INC.



1415 PARK AVENUE, HOBOKEN, NEW JERSEY 07030 (201) 792-2400 Laboratories in Principal Cities

July 17, 1979

Mr. Robert O. McClintock, Chief Materials Radiological Protection Section United States Regulatory Commission Region I 631 Park Avenue King of Prussia, Pennsylvania 19406

Reference: Docket No. 030-11579

Dear Mr. McClintock:

Reference is made to your letter dated July 2, 1979, with respect to an inspection conducted on June 7, 1979 at our facility located in Reading, Pennsylvania. The following is the written response in accordance with the requirements of 10 CFR 2.201. The responses are keyed to the notices of infraction contained in Appendix A of your letter.

A (1). Section II of our Radiation Safety Program, Subsection E, page 4, paragraph (3) states "An individual will not be considered for certification to the level of Radiographer prior to <u>two</u> months as an Assistant Radiographer". It is submitted that the <u>six</u> month requirement cited in Appendix A, Section A, Item 1, was obtained from an outdated copy of our Radiation Safety Program. The current Radiation Safety Program was submitted for approval to the License Management Branch with correspondence dated January 15, 1979 and February 13, 1979, and incorporated into Condition 16 of Amendment 06 to License No. 37-15445-02.

It is also submitted that the two individuals certified as Radiographers in 1979 had at least two and one-half months experience as Assistant Radiographers prior to Certification as Radiographers, as indicated by the attached Safety Training and Certification Records.

A (2). The Radiographers involved in the May 12, 1979 situation have been reprimanded both verbally and in writing by the Radiation Protection Officer, who again stressed the importance of locking and securing source devices prior to movement. Other aspects of the "Operating and Emergency Procedure" were again administered to the men by the R.P.O. In addition, the details of the May 12, 1979 situation have been administered to all other Radiographers at the Reading Branch in an effort to assure no re-occurance of the situation.

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## UNITED STATES TESTING COMPANY, INC.

Mr. Robert O. McClintock

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A (3). The Radiation Protection Officer at the Reading Branch will conduct and document periodic inspections at least quarterly of both in-house work and on-call field services. As the Reading Branch currently does not operate any fixed field radiography sites, the inspection of field services will be planned to cover each individual Radiographer at least quarterly when he is assigned to field services. It should also be noted that periodic inspections of all Radiographers and Assistant Radiographers are conducted monthly by the Radiation Operation Supervisor, as set forth in Section 1, paragraph C page 8.

A (4). The Reading Branch Radiation Protection Officer has submitted the required Source Utilization records to the Radiation Safety Officer for the week of July 9, 1979, and Will continue the submission of these reports on a weekly basis.

Summary: The United States Testing Company, Inc. is aware of the significance of the four infractions listed in the Notice of Violation. In particular, Item 2 is of concern because of the potential for human injury. We believe that the clarification of Item 1, and the corrective actions cited above for Items 2 through 4, have brought the Reading Pranch in full compliance with the Radiation Safety Program and the requirements of 10 CFR Chapter 1.

Very truly yours,

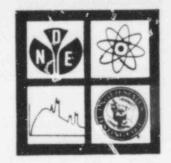
UNITED STATES TESTING COMPANY, INC.

Carl B. Yoder, P.E. Radiation Safety Officer

CBY/dkc Enclosures

# United States Testing Company, Inc.

NONDESTRUCTIVE EXAMINATION DIVISION 430 Little Clinton Street, Reading, Pa. 19601 (215) 376-7434



## NDE PERSONNEL CERTIFICATION FECORD

NAME \_\_\_\_ Gross, Karl

ADDRES \_\_\_\_\_ Wyomissing, Pa.

### EDUCATION

SCHOOL	LOCATION	DATES	CURRICULUM
Penn State Univ.	Wyomissing, PA	1973	Tech.
Holy Name H.S.	Reading, PA	1973 Grad.	C. P.
St.Jos.Rad.Tech.Sc	Reading, PA	6/77	Xray/isotope

## **TECHNICAL TRAINING**

CONDUCTED BY	LOCATION	DATES	METHODS
U.S.Testing Co., Inc.	Reading, PA	1979	16 hr. safety
U.S.Testing Co., Inc.	Reading, PA	1979	20 hr. RT
St.Jos.Rad.Tech.Sc	Reading, PA	1977	RT

### EXPERIENCE

EMPLOYER	ADDRESS	DATES	METHODS	
St. Joseph Hosp.	Reading, Pa.	7/77-1/79	RT Technician	
Fisca Oil Co.	Reading, Pa.	11/78-1/79	N/A	
K & K Maint. Svc.	Birdsborg, PA	10/76-3/77	N/A	

## **EXAMINATION RESULTS**

RADIOGRAPHY	ULTRASONIC	LIQUID PENETRANT	MAG. PARTICLE
97.3x.3=27.8			
95.0x.3=28.5			
100x.4 = 40.0			
96.3%			
5/17/79			
I			
A 5/17/79.			
H. Dreibelli			
	97.3x.3=27.8 95.0x.3=28.5 100x.4= 40.0 96.3% 5/17/79 I	97.3x.3=27.8 95.0x.3=28.5 100x.4= 40.0 96.3% 5/17/79 I A 5/17/79	97.3x.3=27.8 95.0x.3=28.5 100x.4= 40.0 96.3% 5/17/79 I A 5/17/79

This Is To Certify That

Karl Gross

successfully completed the course in \_\_\_\_\_ Radiation Safety

conducted by

Joseph Dreibelbis

United States Testing Co., Inc.

Classroom and Laboratory time\_\_\_\_\_16\_\_\_\_hours. In witness whereof we have affixed our hand and seal

This 2 day of March 19 79

oseph W. Dreefellis Arustor osenh W. Director of Training

# United States Testing Company, Inc.

NONDESTRUCTIVE EXAMINATION DIVISION 430 Little Clinton Street, Reading, Pa. 19601 (215) 376-7434

## NDE PERSONNEL CERTIFICATION RECORD

Jacobs, Randall NAME \_\_\_\_

ADDRESS Reading, Pa

## EDUCATION

SCHOOL	LOCATION	LOCATION DATES	
Reading High School	Reading, Pa.	in and the second	
P.E.W.P. (G.E.D.)	Hielbronn, Ger.	1976	the second s
		the state of the second	
			the second second second

## **TECHNICAL TRAINING**

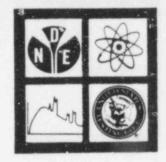
CONDUCTED BY	LOCATION	DATES	METHODS
U.S.Testing Co., Inc.	Reading, Pa.	10/30/78	16 hours Safety
U.S.Testing Co., INc.	Reading, Pa.	1/25/79	20 hours RT
U.S.TestingCo., INc.	Reading, Pa.	6/1/79	8 hours MT
U.S.Testing Co., Inc.	Reading, Pa.	6/13/79	8 hours PT

### EXPERIENCE

ADDRESS	DATES	METHODS
	11/74 - 11/77	NA
	ADDRESS	and the second descent the second descent of the second descent of the second descent descent descent descent d

### **EXAMINATION RESULTS**

METHOD	RADIOGRAPHY	ULTRASONIC	LIQUID PENETRANT	MAG. PARTICLE
GENERAL	73.4x.3=22.0		76.7x.3=23.0	75.8x.3=23.7
SPECIFIC	77.5x.3=23.3		88.0x.3=26.4	100 x.3=30.0
PRACTICAL	97.0x.4=38.8		96.0x.4=38.4	95.0x.4=28.5
COMPOSITE	84.1%		87.8%	85.2%
EYE EXAM.	5-17-79		5-17-79	5-17-79
APPROVED LEVEL	I		II	II
DATE	5-21-79		6-13-79	5-1-79
EXAMINER III	J. Drubelli		& Dreibelli	J. Dreitell



This Is To Certify That RANDALL JACOBS has successfully completed the course in . RADIATION SAFETY conducted by JOSEPH DREIBELBIS United States Testing Co., Inc. Classroom and Laboratory time\_\_\_\_\_16\_\_\_hours. In witness whereof we have affixed our hand and seal C This 30th day of October 19 78 nh W. Dreebell Instructor Director of Training