

April 2, 1980

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Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: NRC Inspection February 15, 1980 (Docket No. 30-4041)
Corrective Action License No. 12-00622-07



Peabody Testing Services

Gentlemen:

This letter is in regard to the inspection performed at our Trevose, Pennsylvania facility on February 15, 1980. The result of the inspection indicated two items of noncompliance which were determined to be infractions. The following is as item by item response to the Notice of Violation of February 25, 1980.

- A. 1. 10 CFR 71.5 requires that transportation of licensed material be made in accordance with the applicable requirements of the Department of Transportation in 49 CFR 170-189.
2. 49 CFR 172.403(g) requires certain items of information be entered in the blank spaces of the radioactive label.
3. Contrary to this requirement, as of February 15, 1980, you failed to include the number of curies, and the transportation index on the package label.

This is an infraction.

Corrective Actions

On March 17, 1980, a Radiation Safety memo was sent to all Peabody Testing Services, a Division of Magnaflux Corporation locations. The memo contained material for the performance of a safety meeting. All Ass't Radiographers, Radiographers, Radiation Safety Monitors must attend this meeting. The majority of the content of this meeting deals with transportation requirements of radioactive material. Also contained in this meeting is a NRC case history "Improperly Shielded Radiography Source Exposes Airline Workers and Passengers to Radiation." Furthermore, the 1st 1980 semi annual review test contains questions regarding transportation requirements so that knowledge of the requirements must be demonstrated.

Date Full Compliance Achieved.

The safety meeting mentioned above must be conducted by April 14, 1980. This is the date full compliance will be achieved.

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- B. 1. Condition 16 of your license requires that licensed materials be possessed and used in accordance with the statements, representations, and procedures contained in your application dated May 13, 1975. One of these procedures is entitled "Radiation Safety and Control Procedures for Radiography".
2. Item 6.0 "Source Changing" of Section 10 of this procedure requires that you survey shipping containers and exposure devices.
3. Contrary to this requirement, as of the day of the inspection, February 15, 1980, you failed to make the required survey of shipping containers prior to shipment.

This is an infraction.

Corrective Action

Individuals at our Trevoze, Pa. facility have been conducting surveys of shipping containers prior to shipment but have failed to document these surveys. In light of this, it is our contention that the severity level of this item be reduced. In order to correct this item our form RSC-3 (Source receipt, transfer, Disposal and Leak Test Report) has been revised to include receipt-disposal shipping container surveys. This form is attached for your review.

Action taken to Avoid Further Noncompliance

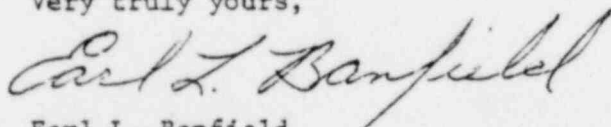
The implementation of the attached form will prevent further non-compliance. The instruction mentioned in the corrective action to item #1 of this letter will also avoid further noncompliance.

Date Full Compliance Achieved

Full compliance achieved as of the date of this letter.

With the information concerning our corrective actions taken to your Notice of Violation provided in this letter, we feel we have replied as required by the regulations. If you require any further information concerning our corrective actions, contact me. Unless we hear otherwise, we will consider this matter closed.

Very truly yours,



Earl L. Banfield
Radiation Safety Officer

ELB/ges
Certified Mail No.

CC: USNRC REG. III
E. Alldredge
R. Faloon
W. Lanagan
H. Sherwood
Phila. RSC
REG. I

Peabody Testing Services

A DIVISION OF MAGNAFLUX CORPORATION

Source Receipt/Transfer/Disposal & ~~RECEIPT~~

Leak Test Report

Source Material _____ Capsule Number _____

RECEIPT

Received From _____

Curies _____ Changer No. _____

Installed in Camera: Model _____ Serial No. _____

Note: Complete leak test report data as shown below.

By: _____ Date: _____

TRANSFER

From Location: _____ To Location: _____

From Camera: Model _____ Serial No. _____

To Camera: Model _____ Serial No. _____

Changer No. _____ Curies: _____

By: _____ Date: _____

DISPOSAL

Sent To: _____

Changer No. _____ Curies _____

By: _____ Date: _____

LEAK TEST

Type of Test: Dry _____ Water _____ Solvent _____

Test Kit Used: _____ Number of Swabs Used: _____

Location Wiped: _____

Camera: Model _____ Serial No. _____

By: _____ Date: _____

Survey
Receipt/Disposal

Shipping Container Type _____

Serial Number _____

Highest Rdg. at Surface _____ mr/hr

Highest Rdg. at 3 ft.
from Surface _____ mr/hr

DISPOSAL

Shipping Container Type _____

Serial Number _____

Highest Rdg. at Surface _____ mr/hr

Highest Rdg. at 3 ft.
from Surface _____ mr/hr