

UNITED STATES NUCLEAR REGULATORY COMMISSION REGIONI

8005071078 631 PARK AVENUE KING OF PRUSSIA, PENNSYLVANIA 19406

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Sun Shipbuilding and Orydock Company ATTN: Mr. James Blenkhorn Vice President for Program Management

Foot of Morton Avenue Chester, Pennsylvania 19013

Gentlemen:

Subject: Inspection 80-01

This refers to the inspection conducted by Mr. F. Costello and Ms. M. Campbell of this office on February 22, 23, and 27, 1980 of activities authorized by NRC License No. 37-02500-01 and to the discussions of our findings held by Mr. Costello with yourself at the conclusion of the inspection.

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

Our inspector also verified the steps you have taken to correct the item of noncompliance brought to your attention in a letter dated August 3, 1979. We have no further questions regarding your action at this time.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This item of noncompliance has been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.

From the discussions at the conclusion of the inspection, it is our understanding that you pian to upgrade your management control program. Specifically, we understand that you plan to conduct management audits of radiographic operations on backshifts such that each radiographer and radiographer's assistant will be audited on a quarterly basis. You are advised to submit this change in your radiation safety program to the USNRC License Management Branch, Washington, D.C. 20555, with a request that they amend your license to include these audits. We further understand that you plan to establish procedures to facilitate NRC inspections of your backshift operations. We are including, in Appendix B to this letter, a list of NRC inspectors who are likely to perform these inspections. In your reply to this letter, please confirm these understandings, including whatever procedures our inspectors should follow to ensure prompt access to your radiographic operations on the backshift, and include any other actions, taken or planned to improve your radiation safety program.

In accordance with Section 2.790 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

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

Sincerely,

Robert O. McClintock, Chief Materials Radiological Protection Section

Enclosures:

Appendix A, Notice of Violation

2. Appendix B, NRC Inspectors Requiring Access on Backshifts

cc w/encls:

F. No11