



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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MAR 2 1979

Twin City Testing and Engineering  
Laboratory, Inc.  
ATTN: Charles W. Britzius  
President  
662 Cromwell Avenue  
St. Paul, MN 55114

License No. 22-01378-02

Gentlemen:

On November 15, 1978, as a result of a failure to survey the source guide tube of a radiographic exposure device, one of your employees at a temporary job site in Wheatland, Wyoming, received a radiation dose in excess of NRC limits. In addition, a second employee received a radiation dose which, while within regulatory limits, was unnecessary. This letter refers to the NRC Region III (Chicago) and Region IV (Dallas) Offices' investigation of the circumstances surrounding the overexposure. The investigation identified three apparent items of noncompliance which are set forth in Appendix A to this letter.

The overexposure resulted from a failure to adequately survey a radiographic exposure device to ensure the full retraction of the source after a radiographic exposure. The radiographer surveyed up to the exposure device but did not survey the source guide tube. On a previous occasion, June 12, 1975, one of your employees received an overexposure calculated to be between 59-100 rems to the left hand. In this earlier case, the major contributing factor was also the radiographer's failure to survey the source guide tube beyond the exposure device. Moreover, during the seminar on radiography held on March 7, 1978, in Region III, failure to perform adequate surveys was described as a major contributor to personnel overexposure. This seminar was attended by representatives of your company.

The primary cause of both this current overexposure and the previous overexposure in 1975, was failure to perform an adequate survey. This causes us concern as to whether proper surveys are routinely performed during conduct of your day-to-day operations and raises doubts regarding the effectiveness of your previous corrective actions. Consequently, we propose to impose civil penalties in the cumulative amount of Four Thousand Five Hundred Dollars (\$4,500) for noncompliance Item Numbers 1 and 2 set forth in Appendix A. Appendix B to this letter is the Notice

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Twin City Testing and  
Engineering Laboratory, Inc.

- 2 -

of Proposed Imposition of Civil Penalties. You are required to respond to the Notice of Violation, and in preparing your response, you should follow the instructions in Appendix A.

Your written reply to the Notice of Violation and the findings of our continuing inspections of your activities will be considered in determining whether further enforcement action, such as additional civil penalties or orders to suspend, modify or revoke your license, may be required to assure future compliance.

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 the enclosures will be placed in the NRC's Public Document Room.

Sincerely,



John G. Davis  
Acting Director  
Office of Inspection  
and Enforcement

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Proposed Imposition of Civil Penalties