



POWER PIPING COMPANY

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TELEPHONE
AREA CODE 412
391-9767

August 29, 1980

United States Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Attention: Mr. George H. Smith, Chief
Fuel Facility and Materials Safety Branch

Re: Inspection 80-1

Dear Mr. Smith:

This letter is in response to the violations submitted to Power Piping Company as a result of your inspection of our Donora facility on July 14, 1980.

Infraction A - Corrective Action and Results

The two individuals identified as performing duties as "radiographers" have been given the required radiographer's examination and have satisfactorily demonstrated their understanding of the duties and responsibilities of a "radiographer." Both individuals have performed the practical examinations and found to be satisfactory.

Other individuals working for Power Piping Company have been reviewed and steps are now being taken as of August 29, 1980 to: A) test these employees; B) analyze their performance based on the results of this examination; C) run review sessions and training sessions as required; D) run the required practical examinations.

Infraction A - Corrective Steps to Prevent Recurrence

We at Power Piping feel that the recurring item of Infraction A was a result of a change over of three different radiation safety officers in a period of 18 months. And at the time of the July 14, 1980 inspection, certain duties were not specifically designated in that they were shared by our Safety Department and QA Department. One of these duties was training and testing.

As of September 1, 1980, Mr. R. Moran of our QA Department has been given full authority and responsibility to enforce our Radiation Safety Program.

In addition, I have assigned our Quality Assurance Department personnel to verify implementation of this on a semiannual basis. Our first audit will be in October, 1980.

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Infraction A - Full Compliance Will be Completed by September 30, 1980

Infraction B - Corrective Action and Results

Power Piping has received a quote from Wesco Incorporated, dated July 28, 1980 for a license exempt source for performing checks of our pocket dosimeters and an order will be placed with them by September 3, 1980. The checks will be performed on an annual basis and verified by documentation upon receipt of the new source from Wesco.

Infraction B - Corrective Steps to Prevent Recurrence

The dosimeters used by our radiographers will be permanently serialized and controlled with stickers that hold expiration dates. These instruments will follow our system used with our survey meters which has worked well for years.

Infraction B - Full Compliance

Full compliance will be by September 30, 1980.

Deficiency C - Corrective Steps Taken and Results

Monitoring of sources in our receiving area has always been performed but not documented.

In the future, monitoring of sources received will be done so on our radiation form QC.120. Correspondence and instructions have been given to all personnel in our Radiography Department to implement this.

Deficiency C - Corrective Steps to Prevent Recurrence

The above will be included in our semiannual audits to verify its implementation.

Deficiency C - Full Compliance

Full compliance will be completed after our next source is received.

Deficiency D - Corrective Steps and Results

Training sessions have been held and correspondence directed to the radiographic personnel to document this last survey on radiation form QC.120.

Deficiency D - Corrective Steps to Prevent Recurrence

The above will be included in our semiannual audits to verify its implementation.

Deficiency D - Full Compliance

Full compliance will be completed by September 30, 1980.

For Infraction B and Deficiencies C and D, certain changes to our Radiation Safety Manual will be required. A review of our manual is currently under way and our targeted completion date for submittal to the NRC is October 31, 1980.

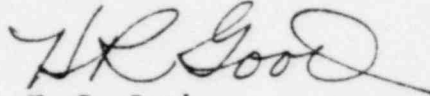
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In conclusion, I would like to add that we fully understand the severity of these infractions and the possible consequences should we fail to execute. We will take all steps including severe disciplinary action if necessary to resolve our recurring problems.

Should you have any questions or comments, please do not hesitate to contact me personally.

Very truly yours,

POWER PIPING COMPANY



H. R. Good
Corporate Director
of Quality Assurance

cc: W. R. Patterson
R. Moran
T. Bradshaw
G. Hillmar
T. Mueller
NRC File