



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
631 PARK AVENUE  
KING OF PRUSSIA, PENNSYLVANIA 19406

JUN 30 1980

Docket No. 30-10811

National Valve and Manufacturing Company  
ATTN: Mr. William Biddle  
Senior Vice President  
Piping Division  
158 49th Street  
Pittsburgh, Pennsylvania 15201

Gentlemen:

Subject: Inspection No. 30-10811/80-01

This refers to the inspection conducted by Mr. C. Stearns of this office on May 9, 1980, and Mr. F. Costello and Ms. M. Campbell of this office on May 15 and 16, 1980, of activities authorized by NRC License No. 37-02895-03 and to the discussions of our findings held by Mr. F. Costello with yourself and Mr. R. Jackson and Mr. G. Koch at the conclusion of the inspection. This also refers to the meeting held at our office on May 27, 1980 and attended by yourself and Mr. R. Jackson of your staff and by Mr. J. Allan, Deputy Director, Region I, and other members of the Region I staff.

Areas examined during this inspection are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, measurements made by the inspector, and observations by the inspector.

Based on the results of this inspection, it appears that certain of your activities were not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. These items of noncompliance have 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.

Item C.1 shown in the Notice of Violation enclosed with this letter has been identified previously during the inspection of your licensed activities conducted on June 27, 1979 and was documented in the enclosure to our letter dated July 20, 1979. Your letter to this office dated August 14, 1979 stated that your radiographers had received additional indoctrination in a training session concerning this requirement and that the situation had been remedied. Item C.3 shown in the Notice of Violation enclosed with this letter has been identified previously during the inspections of your licensed activities conducted on

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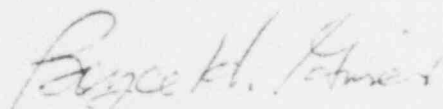
July 20, 1977 and July 19, 1978 and was documented in the enclosures to our letters dated August 4, 1977 and August 4, 1978. Your letters to this office Dated August 29, 1977 and August 21, 1978 stated that the form shown in Figure 14 of the Navco Training Manual would be filled out and retained for each unannounced inspection of radiography personnel by the Radiation Safety Officer and that a master inspection log was being developed to serve as a management tool. From the results of our current inspection, it appears that your corrective actions were ineffective in that these items have recurred. Recurrent and uncorrected items of noncompliance are given additional weight in the selection of appropriate enforcement action. Therefore, in your response to this letter you should give particular attention to those actions you plan to take to ensure that items of noncompliance will be completely corrected and will not recur.

During the meeting on May 27, 1980 Mr. Allan emphasized our concern about the need for an effective management audit system to avoid future items of noncompliance. From these discussions, it is our understanding that your Radiation Safety Officer will be making periodic audits of each radiographer to ensure compliance with NRC's regulations and the conditions of your license. In addition, we understand that these audits will be reviewed by your management to assure that the appropriate corrective action is taken when necessary. You are advised that any changes in your Radiation Safety procedures and organization should be submitted to the USNRC, Division of Fuel Cycle and Material Safety, License Management Branch, Washington, D.C. 20555.

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. If the appendices or the report contain any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in subparagraph (b) (4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, the appendices, report and this letter 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,



Boyce H. Grier  
Director

Enclosures: (See next page)

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Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Office of Inspection and Enforcement Meeting Summary
3. Appendix C, Attendance List
4. Office of Inspection and Enforcement Report No. 30-10811/80-01

APPENDIX A

National Valve and Manufacturing Company  
Pittsburgh, Pennsylvania 15201  
License No. 37-02895-03

Docket No. 30-10811

Based on the results of an NRC inspection conducted on May 9, 15, and 16, 1980, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below:

- A. 10 CFR 20.101(a) requires that you use licensed material in such a manner that no individual will receive an occupational dose to the hands in excess of 18.75 rems in any period of one calendar quarter.

Contrary to this requirement, during the first quarter of 1980 a radiographer in your employ received a dose of 56 rem to his left hand.

This is an infraction.

- B. 10 CFR 20.201(b) requires you to make such surveys as may be necessary to comply with all sections of 10 CFR 20. As defined in 10 CFR 20.201(a), "survey" means an evaluation of the radiation hazards incident to the production, use, release, disposal, or presence of radioactive materials or other sources of radiation under a specific set of conditions.

Contrary to this requirement, as of May 9, 1980, you failed to make such surveys as were necessary to comply with 10 CFR 20.101, "Exposure of individuals to radiation in restricted areas." Specifically, you failed to evaluate the radiation dose to the hand of a radiographer whose hand came within two (2) centimeters of a 29 curie iridium-192 radiography source.

This is an infraction.

- C. Condition 16 of your license requires that licensed material be possessed and used in accordance with the statements, representations and procedures contained in your application dated October 4, 1974, as amended December 11, 1974, and March 19, 1975.

1. Item E on page 3, Section 5 of your March 19, 1975 amended application requires that following each exposure the entire length of the source guide tube be surveyed. 10 CFR 34.43(b) requires that a survey be made, including the entire circumference of the exposure device and the source guide tube, after each exposure to insure that the sealed source has returned to its shielded position.

Contrary to these requirements, on February 11, 1980 and March 18, 1980, radiographers in your employ failed to survey the entire length of the source tube following exposures and failed to determine that the source had returned to the shielded position.

This is an infraction.

2. Section V, "Periodic Training", included with your December 11, 1974 amendment, requires that a minimum of 18 hours per year of radiation safety training be presented to every radiation worker. 10 CFR 19.12 requires that you instruct all individuals working in your restricted areas in the precautions and procedures to minimize exposure to radioactive materials, in the purpose and functions of protective devices employed, and in the applicable provisions of the Commission's regulations and licenses.

Contrary to these requirements, as of May 9, 1980, you failed to provide the required training to radiographers in your employ. Specifically, you failed to present 18 hours per year of radiation safety training to every radiation worker. Furthermore, you failed to adequately instruct one of your radiographers in the proper functioning of your survey meters.

This is an infraction.

3. Supplement 6.g, Section 13.b of your application dated October 4, 1974 requires that you maintain records of your unannounced inspections of radiographers.

Contrary to this requirement, as of May 9, 1980, you failed to maintain records of such inspections.

This is a deficiency.

- D. 10 CFR 34.29 requires that permanent radiographic installations having certain specified high radiation area entrance controls be equipped such that each entrance used for personnel access to the high radiation area have both visible and audible warning signals to warn of the presence of radiation. The use of direct surveillance to prevent unauthorized entry is one of the specified high radiation area entrance controls.

Contrary to this requirement, as of May 9, 1980, entrances to your permanent radiographic installations employing direct surveillance as the high radiation area entrance control were not equipped with the necessary visible and audible warning signals.

This is an infraction.

- E. 10 CFR 34.33(c) requires that pocket dosimeters be checked at periods not to exceed one year for correct response to radiation.

Contrary to this requirement, as of May 9, 1980, you failed to check your pocket dosimeters for correct response to radiation.

This is an infraction.



APPENDIX B

Office of Inspection and Enforcement Meeting Summary

Subject: EVENTS OF FEBRUARY 11, 1980 AND MARCH 18, 1980, AND THE RESULTS OF INSPECTION CONDUCTED ON MAY 9, 15 AND 16, 1980.

On May 27, 1980, representatives of National Valve and Manufacturing Company met with NRC Region I personnel at the Region I Office in King of Prussia, Pennsylvania. The attendance list is attached as Appendix C.

During the meeting, NRC representatives discussed their evaluation of the events which occurred on February 11, 1980 and March 18, 1980, and reviewed the items of noncompliance which resulted from the inspection conducted on May 9, 15 and 16, 1980. NRC representatives indicated that the inspection results demonstrated a need for stronger management controls, a more effective audit program and more specific training in the area of survey techniques.

It was stressed that a comprehensive system of management controls and audits was necessary to ensure that required procedures were being followed at all times and to evaluate the effectiveness of training.

Enforcement options available to the Commission were reviewed.

The National Valve and Manufacturing Company representatives indicated a commitment to operate in a safe fashion in compliance with regulations. They further indicated that the following actions have been taken:

1. Immediate review of the events, causes and preventive actions with all radiographic personnel.
2. Audit results will be reviewed at a high level of management to ensure that appropriate corrective action is taken.
3. Bimonthly training sessions for all radiographic personnel. This training will consist of three hour sessions.

APPENDIX C

Attendance List

Attendance at the NRC - National Valve and Manufacturing Company Meeting on May 27, 1980 at Region I, King of Prussia, Pennsylvania.

NRC

Mr. J. Allan - Deputy Director, Region I  
Mr. G. Smith - Chief, Fuel Facility and Materials Safety Branch  
Mr. H. Crocker - Acting Chief, Materials Radiological Protection Section  
Mr. J. Joyner - Acting Assistant to the Director  
Mr. J. Costello - Radiation Specialist, Materials Radiological Protection Section  
Dr. J. Glenn - Radiation Specialist, Materials Radiological Protection Section

National Valve and Manufacturing Company

Mr. W. Biddle - Senior Vice President, Piping Division  
Mr. R. Jackson - Quality Assurance Manager