North American Inspection, Inc.

P.O. Box 88 Laurys Station, PA 18059 (215) 262-1100



September 28, 1989

UNITED STATES NUCLEAR REGULATORY COMMISSION Region 1 475 Allendale Road King of Prussia, PA 19406

Attention: John R. White, Chief

Nuclear Materials Section C

Division of Radiation Safety and Safeguards

Subject: Response to Routine Inspection No. 030-20982/89-001

Reference: License No. 37-23370-01

Docket No. 030-20982

Dear Mr. White:

Attached in Appendix A is the North American Inspection Incorporated response to the inspection referenced above. We are confident, after your review, the Commission will agree that North American Inspection, Inc. has been effective in maintaining our program in a safe manner.

Should you have any questions, please contact Mr. Robert Shumway or myself at (215) 262-1100.

Sincerely,

NORTH AMERICAN INSPECTION, INC.

Don B. Shumway

Radiation Safety Officer

DBS:wdm

9002230123 900205 REG1 LIC30 37-23370-01 PNU North American Inspection, Inc.

Docket No. 030-20982 License No. 37-23370-01

AFPENDIX A Response

Restatement of Violation

10 CFR 20.101(a) limits the whole body radiation dose of an individual in a restricted area from radioactive material and other sources of radiation to one and one quarter rems per calendar quarter, except as provided by 10 CFR 20.101(b). Paragraph (b) allows a whole body radiation dose of three rems per calendar quarter provided specified conditions are met.

Contrary to the above, two individuals working in the restricted area received whole body radiation doses of 2.1 and 1.7 rems respectively from radiographic sources and x-ray equipment during the third calendar quarter of 1988 and the conditions of paragraph (b) were not met.

Response Item 1

1. On October 2, 1988 Bobby Sheets, Larry Luellen, and Alvin Foster were making the initial set up of the crawler when one of them tripped the star wheel that activated the x-ray machine. It was stated that they set the machine down and ran to get away from the radiation. Before going back to work each checked their dosimeter and none were off scale. No more thought was given to it at that time, and no one knew there was a problem, until notified by Landauer on November 16th. By that time the job had ended.

If the radiographers involved had been working when the film badge results were received they would have been laid off due to the high readings.

During the off season both men have received an additional 40 hours Radiation Safety Training. Mr. Sheets attended class on January 28, 29, and February 4 & 5th. And returned to work on July 11, 1989. Mr. Luellen attended class January 16 - 20, 1989, and returned to work May 9, 1989.

Attachments

- 1. Landauer report for Bobby Sheets
- 2. Notification to and response from Bobby Sheets
- 3. Landauer yearly totals for Bobby Sheets
- 4. Training Certificate Bobby Sheets
- 5. Landauer report for Larry Luellen
- 6. Notification to and response from Larry Luellen
- 7. Landauer yearly totals for Larry Luellen
- 8. Training Certificate Larry Luellen

Response Item 2

 During the first reporting period of the 3rd quarter of 1988, Mr. Kerry Frack received an exposure to his film badge of 1240 MR. North American Inspection, Inc.

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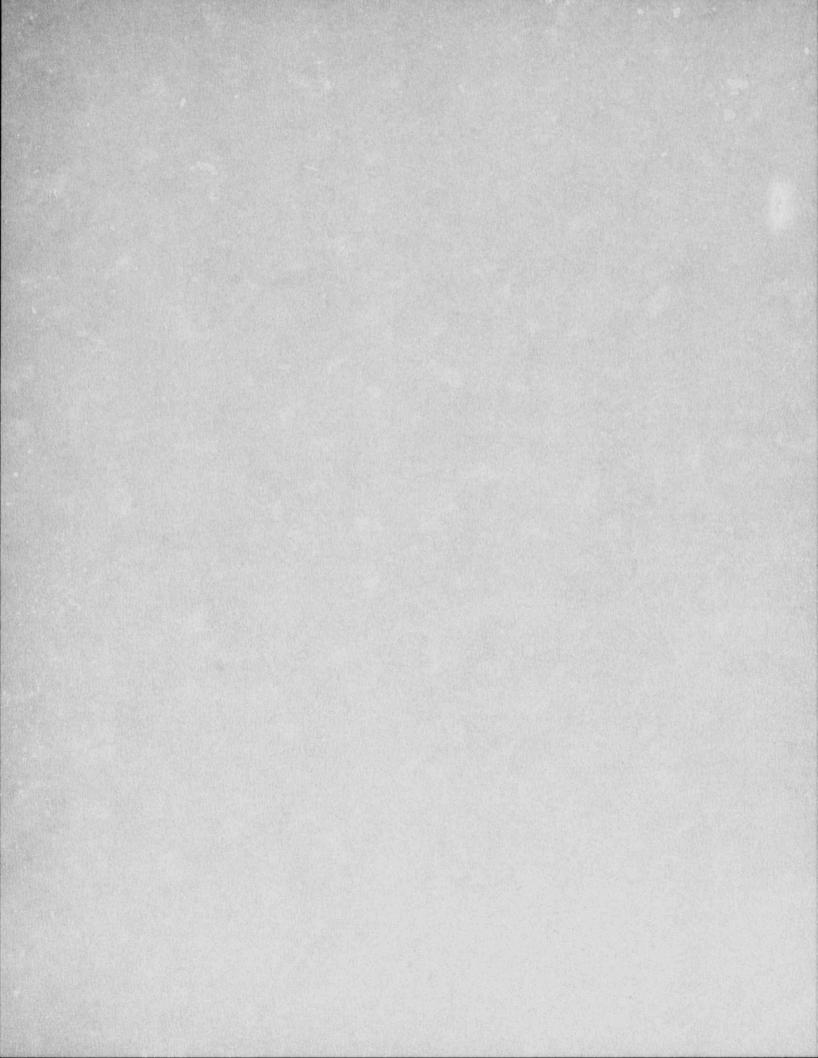
In talking to Mr. Frack he indicated that his dosimeter readings for that period, 7/20-8/19 were normal for the type of work that we had been doing. He stated that no time had his dosimeter gone off scale, his dosimeter report (attached) reflected 226 MR for the period.

In reviewing the Landauer report I noted that they indicate that the film packet may have been exposed out of the filtered holder.

In Mr. Frack's case we feel that we have satisfied the requirements of 20.101(b). In that we have a signed NRC Form 4 in his file referring to the Landauer reports that satisfy the requirements of 20.101(b) (3), allowing Mr. Frack the maximum 3 R for the quarter.

Attachments

- 9. NRC Form 4
- 10. NRC Form 5
- 11. Landauer Reports
- 12. Dosimeter Record



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