

These vehicles were classified as temporary overnight storage "unrestricted area" where levels of radiation are less than 2 mr/hour from the vehicle. For several years NRC inspectors were shown the location and it was explained in detail the purpose of storing sealed sources on parked vehicles as an "unrestricted area". No contradiction to this method was mentioned.

We are in the process of obtaining a permanent storage facility, which should be on or about September 30, 1980, hopefully sooner. At such time, a description of the storage building and location will be submitted.

Item D - 10 CFR 20.105(B) Radiation Levels in an Unrestricted Area

On June 5, 1980, we had a barrier of 200 square feet set up. Mr. Rowe and Mr. Kurtz made the survey around the perimeter of approximately 800 feet of radiation rope barrier. This high level was found three feet from the ground. The source was focused in a northerly direction colimated with additional lead surrounding the source to minimize radiation levels. Only one exposure was required in this direction for a duration of six minutes. There were no refinery or contractor personnel in the area. The Assistant Radiographer was monitoring the northern area will within safe limits. No individual could have entered this area without being observed.

To correct this situation a larger barrier will be erected or faster film will be utilized and a closer source to film distance will also be used. All of these factors should contribute to an exposure of one third the time of six minutes, so that any individual would receive a dose of 2 mr/hour or less.

Item E - 34.33(A) Personnel Monitoring Equipment

ARS personnel have been instructed to charge their dosimeters each morning when performing radiographic inspection work. The charger in question was not working properly on this date. Mr. Kurtz had two dosimeters. He tried one and it went off scale and could not be brought back on scale. Mr. Kurtz would not try to zero the second dosimeter for fear it too would go off scale, resulting in not being able to continue work.

To correct this situation ARS has purchased two new dosimeter chargers and these are on said vehicles. Each vehicle has two operable chargers and dosimeters are charged daily at the beginning of each shift. Effective June 9, 1980.

Item F - 10 CFR 34.33(C) Personnel Monitoring

ARS personnel have been issued many new dosimeters over the past years. If any dosimeter does not seem to respond to recharging or will walk off scale, a new dosimeter is issued. ARS personnel have two dosimeters on hand at all times.

Corrective action to be taken will be to have radiographers and radiographers assistants write down the expiration or calibration due date next to their dosimeter serial number on the reverse side of the Utilization Log. When the Radiation Protection Officer will check for correct response to radiation. Effective immediately.

Item G - 10 CFR 34.25 Leak Testing

A misinterpretation of this statute was a serious error on Mr. Kurtz's part as Radiation Protection Officer.

A leak test of Tech Ops Meter Calibration Kit Model 571 has been taken prior to shipping this source back to Tech Ops. Effective immediately.

Item H - 10 CFR 71.5 Transporting of Radioactive Material

ARS was not aware of the time limit required by licensee's to convert to Type B packaging to be in compliance with 49 CFR 173.394(B).

ARS has purchased two Type B containers for transporting Type B quantities of special form radioactive materials. Effective immediately.

Item I - 10 CFR 34.27 Utilization Logs

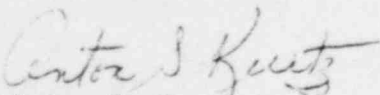
This item of noncompliance has been answered in my letter to the NRS dated October 9, 1979, Docket No. 30-08048/79-01.

Item J - 10 CFR 20.401(G) Records and Surveys, Radiation Monitoring and Disposals

Advanced Radiation Service, Ince did not order or receive any quantities of cobalt 60 on the date specified. ARS does not own or possess any cobalt-60.

Should you have any questions concerning this letter, please do not hesitate to contact us.

Very truly yours,


Anton S. Kurtz
President