## Newport News Industrial Corporation of Ohio

A Subsidiary of Newport News Industrial Corporation A Tenneco Company



P.O. Box 25 Perry, Ohio 44081

230--41st Street Newport News, Virginia 23607

Document Number 701-12794

June 27, 1983

United States Nuclear Regulatory Commission Region III - 799 Roosevelt Road Glen Ellyn, Illinois 60137

Attention: Mr. D. J. Sreniawski, Chief Materials Radiation Protection Section 2

Subject: NRC Routine Safety Inspection - May 11, 1983

- References: (a) Title 10 of the Code of Federal Regulations, Part 34 (b) NRC Byproduct Material License Mamber 34-16205-01
- Enclosures: (1) NNICO Quarterly Source Inventory dated July 10, 1981 (2) NNICO Indoctrination and Training Session dated June 27, 1983

Dear Mr. Sreniawski:

This letter is written in response to the report of the routine safety inspection conducted on May 11, 1983, by Mr. Donald R. Gibbons. Appropriate corrective action has been taken in this matter as described below.

The violation noted in Item 1 of the Notice of Violation resulted from an NNICO misinterpretation of the leak testing requirements as specified in 10CFR34.25 (b) and Condition 12B of NNICO's Byproduct Material License Number 34-16805-01. Prior to this audit, sealed sources were in most cases being removed from use and placed in approved storage/shipping containers prior to the end of the sixmonth period requiring leak testing, with a "no leak test" notation made on appropriate quarterly source inventory documentation (Enclosure 1 identifies one example cited in the violation). Condition 12B of the NNICO license specifies that the six-month leak test "...does not apply to radiography sources that are stored and not being used." However, the second half of this condition states: "The sources excepted from this test shall be tested for leakage prior to any use or transfer to another person unless they have been leak tested within six months prior to the date of use or transfer." This requirement resulted in the noted violation, as sources ready for shipment had been considered exempted from leak testing.

This misinterpretation has now been corrected, and from now on all sealed sources will be leak tested in accordance with all applicable requirements. To avoid such occurrences in the future, an indoctrination and training session has been held with all NNICO radiographic

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personnel who have "source transfer/leak test" responsibility, and all are now aware of the specified requirements (Enclosure 2). No additional corrective action is considered necessary.

An amendment of the NNICO Industrial Radiography Program (as represented by Byproduct Material License Number 34-16805-01) is currently being developed, identifying changes in the Company organization. Emphasis will be placed on this leak testing requirement in conjunction with this amendment, which is scheduled for submittal to the Nuclear Regulatory Commission in July.

Please contact me if you have any questions.

Yours very truly,

James E. Staffiera QA/QC Manager

cc: H. L. Dehoff, Corporate RSO, NNI-VA W. A. Lee T. E. Bond D. W. Richardson Records Center JES' corr. file



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## QUARTERLY SOURCE

DATE SOURCE RECEIVED	1-14-81	5-5-81	
SOURCE NUMBER ,	14271*	14541	
BYPRODUCT MATERIAL	Iridium 192	Iridium 192	Iridium 192
CHEMICAL AND/OR PHYSICAL FORM	Sealed Source	Sealed Source	Sealed Source
SUPPLIER	Auto. Ind.	Auto. Ind.	Auto. Ind.
ENCAPSULATION NUMBER	200-52	200-52	200-52
QUANTITY OF BYPRODUCT WATERIAL	22 EURIES	LOO CURIES	-
TYPE OF EXPOSURE DEVICE	Auto.Ind. Model520	Auto.Ind. Model520	Auto.Ind. Model520
EXPOSURE DEVICE	0095	390	
DATE OF LAST SWIPE TEST	1-13-81	5-1-81	
LOCATION OF BYPRODUCT MATERIAL	Perry Site	Perry Site	Perry Site
BYPRODUCT MATERIAL OWNED BY	NNICO	NNICO	NNICO
PERIOD OF POSSESSION	1-14-81 Ehru 9-25-81	5-5-81 then 9-25-81	

BY:

7/10/81 MANAGEMENT DELECATE

\* SOURCE REMOVED FROM SERVICE 7-10 BI (PRIDE to 6 MONTH LEAK TEST) SOURCE being STORED UNTIL SOURCE CHANGER IS AVAILABLE TO RETURN FOR DISPOSAL

Enclosure 1 Document Number 701-12794

## Newport News Industrial Corporation of Ohio

1			
	INDOCTRINATION AND TRAD	INING SESSION	
DATE AND TIME OF SESS	SION - JUNE 27, 1983,	3:15 P.M.	
	NRC ROUTINE SAFETY INSPE	CTION - MAY 11, 1983	
	NNICO BYPRODUCT MATERIA	L LICENSE # 34-1680	05-01
DURATION OF SESSION -	- 20 MINUTES		
INSTRUCTOR -			
	PRESENTED IN SESSION:*		
COMPLETE REVIEW	N OF NRC ROUTINE SAFET	TUSPECTION OF TH	E NNICO
INDUSTRIAL RADIOGRAPHY	PROGRAM, PERFORMED MAY	11, 1983 - SPECIFICAL	LY THE REPORT
	THE NOTICE OF VIOLATION		
	THE FOLLOWING TOPICS:		
D NRC/NNT.CO	BYPRODUCT MATERIAL LICEN	SE (#34-16805-01)	EQUIREMENTS;
2) Two WIDLATIO	NS NUTED DURING THE INSPEC	TON FAILURE TO PER	FORM PERIODIC
(SIX-MONTH	) LEAK TESTS OF SEALED SOL	DRCES AND INCOMPLE	TE DOCUMENTATION
	INT OF SEALED SOURCES;		
	ICES CONTRIBUTING TO THE	VIOLATIONS:	
	INSE TO THE NEC REPORT, INC		TICN: AND
5) PROPOSED AME	NOMENT TO THE NINICO INOU	STRIAL RODIOGRAPHY PA	OGRAM IDENTIFYING
COMPANY O	RGANIZATION CHANGES AND E	EMPHASIZING SEALED S	OURCE LEAK-TESTIN
REQUIREMEN			
	ANSWERED DURING THE SESSI	NN.	
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SESSION ATTENDEES:**			Staffiera 6-27-83
SESSION ATTENDEES:**	SIGNATURE		JOB FUNCTION
NAME (Please print)	SIGNATURE David MBer	Jim I	-2
DAND M. BEVAN		Jim S.S. NUMBER	JOB FUNCTION
DAVID M. BEUAN WILLIAM J ADAMOVICA	David MBere	Jim S.S. NUMBER 273-64-1004	JOB FUNCTION INSPECTOR INSPECTOR INSPECTOR
NAME (Please print) DAND M. BEUAN WILLIAM J ADAMONICA Leslic W BISSET	David MBere Willian & Alamoral Theo Wint	Jim S.S. NUMBER 273-64-1004 301-44-7834 287-38-8300	JOB FUNCTION INSPECTOR INSPECTOR INSPECTOR INSPECTOR
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