

FEBRUARY 17, 1993

DOCKET NO. 030-32883
LICENSE NO. 42-25214-01

REGIONAL ADMINISTRATOR, REGION II
U.S. NUCLEAR REGULATORY COMMISSION
101 MARIETTA STREET, N.W.
ATLANTA, GA 30323

GENTLEMEN:

SUBJECT: REPLY TO A NOTICE OF VIOLATION
(NRC INSPECTION REPORT NO. 42-25214-01/93-01)

IN RESPONSE TO YOUR LETTER, NOTICE OF VIOLATION, RECEIVED JANUARY 23, 1993.

1) A WRITTEN EXPLANATION FOR THE REASON OF VIOLATION: (A)

VIOLATION OCCURANCE WAS IN PART ATTRIBUTED TO THE FACT THAT THE THREE (3) INDIVIDUALS INVOLVED WERE CHIEFLY WORKING IN A DIVERSE METHOD OF N.D.T. OTHER THAN RADIOGRAPHY. AT THE TIME THE AUDIT'S WERE CONDUCTED THE THREE (3) INDIVIDUALS WERE NOT PART OF OUR DAILY RADIOGRAPHIC OPERATIONS AND WERE ONLY UTILIZED ON WEEKENDS AS WORK LOAD NECESSITATED.

- 2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:
3) CORRECTIVE STEPS THAT HAVE BEEN TAKEN TO AVOID FUTURE VIOLATIONS:

TO CORRECT THE PROBLEM, TECHNICAL WELDING LABORATORY, ST. CROIX HAS INSTITUTED A POLICY TO UTILIZE THE INCOMING TLD REPORTS AS A CHECK LIST TO INSURE EVERY MONITORED EMPLOYEE IS GIVEN A FIELD AUDIT WITHIN THE REQUIRED NINETY (90) DAY PERIOD.

4) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

TECHNICAL WELDING LABORATORY, ST. CROIX LAST QUARTERLY FIELD AUDIT WAS PERFORMED OVER THE PERIOD OF NOVEMBER 13, 1992 THRU NOVEMBER 18, 1992. AFTER OUR AUDIT ON JANUARY 05, 1993 BY MR. FULLER, WE IMMEDIATELY CONDUCTED A FIELD AUDIT FROM JANUARY 06, 1993 THRU JANUARY 18, 1993 TO INSURE THAT ALL RADIOGRAPHER'S AND ASSISTANT'S HAD BEEN AUDITED AND WERE IN FULL COMPLIANCE

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1) A WRITTEN EXPLANATION FOR THE REASON OF VIOLATION: (R)

UPON RECEIVING THE VIOLATION, WE IMMEDIATELY WENT TO OUR FILES AND REVIEWED THE INSPECTION AND MAINTENANCE RECORDS ON THE TWO (2) EXPOSURE DEVICES IN QUESTION, SERIAL #114 & #293. INSPECTION WAS CONDUCTED ON AUGUST 08, 1992. THE INSPECTION WAS RECORDED ON THE SAME PAPERWORK AS THE JULY 09, 1992 INSPECTION. THEREFORE THE NOVEMBER 13, 1992 INSPECTION WAS ACHIEVED WITHIN THE REQUIRED NINETY (90) DAY PERIOD, AND TECHNICAL WELDING LABORATORY, ST. CROIX WAS IN FULL COMPLIANCE.

2) CORRECTIVE STEPS THAT HAVE BEEN TAKEN AND THE RESULTS ACHIEVED:

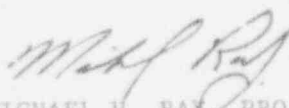
3) CORRECTIVE STEPS THAT HAVE BEEN TAKEN TO AVOID FUTURE VIOLATIONS:

AS MENTIONED ABOVE THE INSPECTION DATES, JULY 09, 1992 AND AUGUST 24, 1992 WERE RECORDED ON THE SAME PAGE OF PAPERWORK, THEREBY CAUSING CONFUSION. WE IMMEDIATELY INSTITUTED A NEW POLICY OF ONE PAGE PER INVENTORY PERIOD. PLEASE NOTE THE ATTACHED CORRESPONDENCE RELATING TO THE INVENTORY INSPECTION AND MAINTENANCE IN QUESTION FOR YOUR RECORDS.

4) DATE WHEN FULL COMPLIANCE WAS ACHIEVED:

ACCORDING TO OUR RECORDS WE WERE IN FULL COMPLIANCE. AS STATED IN PART 3, WE HAVE IMPLEMENTED A MORE IMPROVED SYSTEM OF EXHIBITING INVENTORY INSPECTION AND MAINTENANCE.

RESPECTFULLY,



MICHAEL H. RAY, PROJECT MANAGER - R.S.O.
TECHNICAL WELDING LABORATORY
ST. CROIX, U.S.V.I.

CC: U.S.N.R.C.
DOCUMENT CONTROL DESK
WASHINGTON, D.C. 20555

ENCL

QUARTERLY INVENTORY

INSPECTION & MAINTENANCE

Camera		Source			Safety Plug		Lock	Pigtail Connector	Labelling	Handle	Source Tube	Drive-Cable Connector	Crank-Out Conduit	Inner Drive-Cable	Drive Gear Condition	Abnormal Radiation Levels	Location	Signature	Date
Make	Serial Number	Type	Serial Number	Number of Curies	S	U	S	U	S	U	S	U	S	U	S	U			
SPEC. 2T	S/N # 114	IR 192	S/N # 03F07	63 CU.	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	7.9.92
SPEC. 2T	S/N # 293	IR 192	S/N # 26C09	38 CU.	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	7.9.92
SPEC. 2T	S/N # 767	IR 192	S/N # 26C10	38 CU.	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	7.9.92
SPEC. C.I	S/N # 10 209	IR 192	S/N # 09X06	20 CU.	-	X	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	7.9.92
This Source was Returned to Spec. 8.24.92																			
SPEC. C.I	S/N # 10 209	IR 192	S/N # 20H04	85	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	8.24.92
SPEC. 2T	S/N # 767	IR 192	S/N # 26C10	25	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	8.24.92
SPEC. 2T	S/N # 293	IR 192	S/N # 26C09	25	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	8.24.92
SPEC. 2T	S/N # 114	IR 192	S/N # 03F07	45	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	8.24.92
Gamma Century	2275	IR 192	S/N # 20H05	60	-	-	-	-	-	-	-	-	-	-	-	-	H.O.V.I.C.	M.C. Oliver	10.1.92