

Mullauer



INSPECTION SPECIALISTS, INC.

5201 TARAVELLA ROAD • MARRERO, LA 70073 • TEL. (504) 347-5600 • FAX: (504) 348-8001

9 March, 1993

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

ATTN: ROY CANIANO, CHIEF
NUCLEAR MATERIALS SAFETY BRANCH

REF: DOCKET NO. 999-90003
NRC INSPECTION REPORT NO. 99-90003/92048(DRSS)

Dear Mr. Caniano,

As per your letter dated February 11, 1993, please find enclosed the necessary and required notifications of the corrective actions taken by INSPECTION SPECIALISTS, INC. to correct the possible violations found during the N.R.C. inspection of our personnel and contracted personnel at Wright Patterson Air Force Base in Fairborn, Ohio on September 28, 1992.

In reference to the violations cited, please find below the corrective action taken to alleviate the possibility of future citations.

Violation No. 1

It is the contention of the N.R.C. inspector that INSPECTION SPECIALISTS, INC. lead radiographer and contracted personnel allowed the creation of radiation levels above the required limit of 2 mR/hr in unrestricted areas.

Response:

Due to the variances in survey meter response, the INSPECTION SPECIALISTS, INC. lead radiographer believed that the 2 mR/hr boundary was posted correctly and noted such on the required job site paperwork.

Although a violation was cited, the radiographer believed that there was no violation being made when he posted the 2 mR/hr boundary and recorded the results of his survey.

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VISUAL INSPECTION AND NONDESTRUCTIVE TESTING SPECIALISTS

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United States Nuclear Regulatory Commission
Region III
9 March, 1993
Page 2

Upon completion of an investigation of the violation including discussion with the INSPECTION SPECIALISTS, INC. lead radiographer and a review of all documents it was pointed out that during the inspection, a side-by-side comparison of the radiation levels at the boundary site in question was performed. The lead radiographer has communicated that there was a variance in survey meter readings. His meter, N.D.S. products Model 2000, calibrated 08/07/92, read 2 mR/hr which he documented on the required field survey report. The N.R.C. inspectors survey meter, Xetex Model NRC 033481, calibrated 05/19/92, read 4 mR/hr.

Calculations by INSPECTION SPECIALISTS, INC. lead radiographer indicate a dose rate of less than 1 mR/hr based upon a total exposure time of between 16 to 20 minutes per hour and a boundary reading of 2 mR/hr using the above referenced N.D.S. survey meter.

Corrective Action:

All radiographers and assistants have been instructed in the proper techniques for posting and maintaining restricted areas along with other topics of radiation safety. This instruction was provided in the form of a Radiation Safety Refresher Course given by myself on October 10, 1992, and annually.

In addition, proper techniques for posting and maintaining restricted radiation areas are discussed periodically at weekly safety meetings.

Please find enclosed the outline of the Radiation Safety Refresher Course and several safety meeting minutes.

Violation No. 2

INSPECTION SPECIALISTS, INC. did not, at the time of the inspection, have a N.R.C. approved Q.A. program, and is not registered with the N.R.C. as an approved user of type B containers.

United States Nuclear Regulatory Commission
Region III
9 March, 1993
Page 3

Corrective Action:

INSPECTION SPECIALISTS, INC. has submitted to the N.R.C. for approval a Q.A. program and has written to the N.R.C. for approval as a user of type B packages.

Please find enclosed a copy of INSPECTION SPECIALISTS, INC. Q.A. program and letter requesting approval as a user of type B packages.

Violation No. 3

INSPECTION SPECIALISTS, INC. personnel transported radioactive material away from its storage facility, and the transport index was not a dimensionless number on the shipping papers.

Corrective Action:

During the previously mentioned Radiation Safety Refresher Course, shipping paper completion was covered in the section "Regulations N.R.C. and Louisiana". All applicable employees have been directed in the use of the transport index as a dimensionless number for labeling and transportation.

Violation No. 4

INSPECTION SPECIALISTS, INC. personnel transported a reportable quantity of Cobalt-60 without the letters "RQ" marked on the package.

Corrective Action:

All future shipments of reportable quantity radioactive material shall have the letters "RQ" marked clearly on the package.

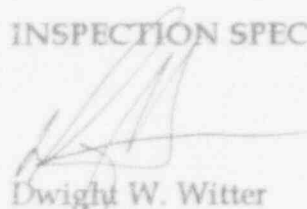
United States Nuclear Regulatory Commission
Region III
9 March, 1993
Page 4

It is the intention of INSPECTION SPECIALISTS, INC. to adhere to all regulations of the Nuclear Regulatory Commission and the State of Louisiana, as well as our own safety regulations. Be assured, Mr. Caniano, that INSPECTION SPECIALISTS, INC. has addressed these violations and hopes to continue its excellent record of personnel and radiation safety.

Should you require additional information or clarification, please feel free to contact this office.

Sincerely,

INSPECTION SPECIALISTS, INC.



Dwight W. Witter
Radiation Safety Officer

DWW:sh

Enclosures



5201 TARAVELLA ROAD • MARRERO, LA 70073 • TEL: (504) 347-5800 • FAX: (504) 348-8001

SAFETY MEETING
NOVEMBER 2, 1992

ATTENDANCE:

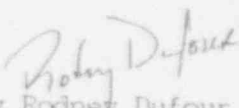

Eric Williams
Johnny Logan
Scott Fitzpatrick
Stephen Swisher
Scott Folse
Vic Eckerle
Kevin Rehm
Bruce Plaisance
Benny McGrath
Mark O'Quain

ON JOB:

Keith O'Quain
Dwayne New

ABSENT:

Travis Moore

Meeting was directed by  Rodney Dufour and  Dwight Witter.

SAFETY

- 1) Thank employees for not using cameras without proper paperwork. This shows that people are safety and procedurally orientated.
- 2) Hand-out decay charts, take back old decay charts.
- 3) Remind employees to check the calibration dates on their radiation survey meters, go over the usefulness of properly calibrated/working survey meters.
- 4) Dosimeters are due for calibration, over the next 2 or 3 weeks. Give your dosimeter to Dwight and he will give you a spare while yours is being calibrated.
- 5) Regulations for transporting sources of I, II & III transport indexes:
 - a) Label properly
 - b) Package correctly
 - c) Placard vehicle (III only)
 - d) Survey properly
 - e) Complete required shipping documents
- 6) The need for strict compliance with our and our clients personal protective equipment policies:
 - a) Shoes
 - b) Eye protection
 - c) Head protection
 - d) Fall protection

SAFETY MEETING CONTINUED
NOVEMBER 2, 1992
PAGE 2

DISCUSSED

- 1) Housekeeping - keep your darkrooms and job locations clean.
 - a) They reflect on you and the Co.
 - b) They make you feel better about yourself and the place you work.
 - c) Good housekeeping is safer and keeps equipment maintained.
- 2) Ethics - do your job and make the correct calls, don't do anything that may question your integrity.
- 3) Training classes are subject to change and will be more often than anticipated.



INSPECTION SPECIALISTS, INC.

5201 TARAVELLA ROAD • MARRERO, LA 70073 • TEL: (504) 347-5600 • FAX: (504) 348-8001

SAFETY MEETING
OCTOBER 13, 1992

ATTENDANCE:

Keith O'Quain
Johnny Logan
Stephen Swisher
Vic Eckerle
Scott Folse
Mark O'Quain
Travis Moore
Kevin Rehm
Ronald Mistrot
Scott Fitzpatrick
Eric Williams
Dwight Witter

ON JOBS:

Jason Stone
Bruce Flaisance
Dwayne New

ABSENT:

Rodney Dufour *Dwight Witter*
Meeting was directed by Rodney Dufour and Dwight Witter. Topics discussed are listed below. Anyone not attending safety meeting will receive a copy of these minutes.

DISCUSSION:

1) School Saturday

- a) Went well and appreciate attendance.
- b) Will have inverse square law on board today.
- c) School will be held second Saturday of every other month.
- d) Various topics will be discussed, SUGGESTIONS WELCOME!!!

2) Keeping up calibrations on survey meters and dosimeters

- a) Dosimeters calibration due November
- b) Survey meter calibration schedules will be given so that meter will be turned in on Monday for calibration on following Friday.

SAFETY & QUALITY

- 3) Dwight Witter has been promoted to Safety and Training Officer and has full backing of management. His duties will be to improve quality and safety from all stand points. Your cooperation is appreciated.

GENERAL

- 4) Housekeeping in the shop area and parking lot needs to improve.
- 5) Mag area: Please keep equipment together, put back when finished and notice what you need before you leave.
- 6) MIL is building more welding booths, meaning less shop area. Please bring all personal belongings home and pick-up after yourself when working in shop.



INSPECTION SPECIALISTS, INC.

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SAFETY MEETING AUGUST 31, 1992

ATTENDANCE:

Bruce Plaisance
Jason Stone
Vic Eckerle
Steve Swisher
Scott Folse
Keith O'Quain
Mark O'Quain
Kevin Rehm
Johnny Logan
Ronald Mistrot

ABSENT:

Dwight Witter

TARDY:

Benny McGrath

Meeting was directed by Rodney Dufour. Topics discussed are listed below.

DISCUSSION:

- 1) Reviewed Operating and Emergency Procedure
 - a) All technicians have it with them.
 - b) Read this carefully and understand.
 - c) It is your responsibility to know all information and procedures discussed.
- 2) Rigs:

Brown rig - engine costs \$1850.00 due to no oil. Next engine blown will be paid for by crew.
- 3) Schedule and times will be posted for schools, training and testing.
 - a) O & E Procedures
 - b) Louisiana Regulations
 - c) Level I's & II's - R/T, M/T, P/T, U/T
 - d) General Knowledge, etc...
- 4) Equipment being used out of calibration set on shelves broken
 - a) Check all calibrations
 - b) Working conditions
 - c) Return where found
 - d) Tag when broken

Anyone not attending safety meeting will receive a copy of these minutes.



INSPECTION SPECIALISTS, INC.

5201 TARAVELLA ROAD • MARRERO, LA 70073 • TEL: (504) 347-5600 • FAX: (504) 348-8001

SAFETY MEETING 10 NOVEMBER, 1992

ATTENDANCE:

Scott Folse
Johnny Logan
Jason Stone
Vic Eckerle
Travis Moore

ON JOB:

Keith O'Quain
Eric Williams
Bruce Plaisance
Steve Swisher
Jeff Fose
Ron Mistrot

ABSENT:

Benny McGrath
Dwayne New
Kevin Rehm

Meeting was directed by Rodney Dufour and Dwight Witter. A copy of these minutes will be issued at the next safety meeting.

SURVEY METERS - Check the list, it's up there for a reason. This weekend, I checked the meters and there were 4 meters from the list in the trucks. Check them today!!

Tests will be given today to several people. If you don't have a job today, come see me after the meeting. Tests will be given weekly until everybody is current for their jobs. I suggest you come see me before you have to take a test.

Safety equipment isn't free. If you need new safety glasses, you need to turn in your old pair same with hardhats, etc.

NOMEX SUITS - After you use a nomex suit, clean it up and bring it back. We don't have enough for everyday and we don't have enough time to hunt down a nomex suit and it may be you that doesn't have one when you need it.

RADIATION SAFETY - All of the plants have safety departments. How many people here can tell their safety person, or anybody, for that matter why you only need a certain distance for your 2 mR boundary instead of what they might think. One good way is through the use of your dose rate formula and inverse square law.

FILM - Use 50 speed for pipe of 6 inches O.D. or smaller. Check your film weekly and don't keep too much in your rig at one time.

HOUSEKEEPING - Clean up after yourselves, when a darkroom comes in, clean it up, take the equipment and film out and put it where it belongs.

EQUIPMENT - Don't take anybody else's equipment, they may need it.



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RADIATION SAFETY REFRESHER COURSE OUTLINE
10/10/92

- I. RADIATION EFFECTS
 - 1) Ionization
 - 2) Effects on cells
 - 3) Somatic & genetic effects
 - 4) Specific limits
- II. REM
- III. RAD
- IV. DOSE RATES
- V. MANUFACTURER OF IR-192
- VI. RADIOACTIVE HALF - LIFE
- VII. LEAK TESTING
- VIII. TIME, DISTANCE, SHIELDING
- IX. INVERSE SQUARE LAW
- X. HALF VALUE LAYRES
- XI. REGULATIONS
 - 1) NRC Regs.
 - 2) La. Regs.
 - 3) Reciprocity

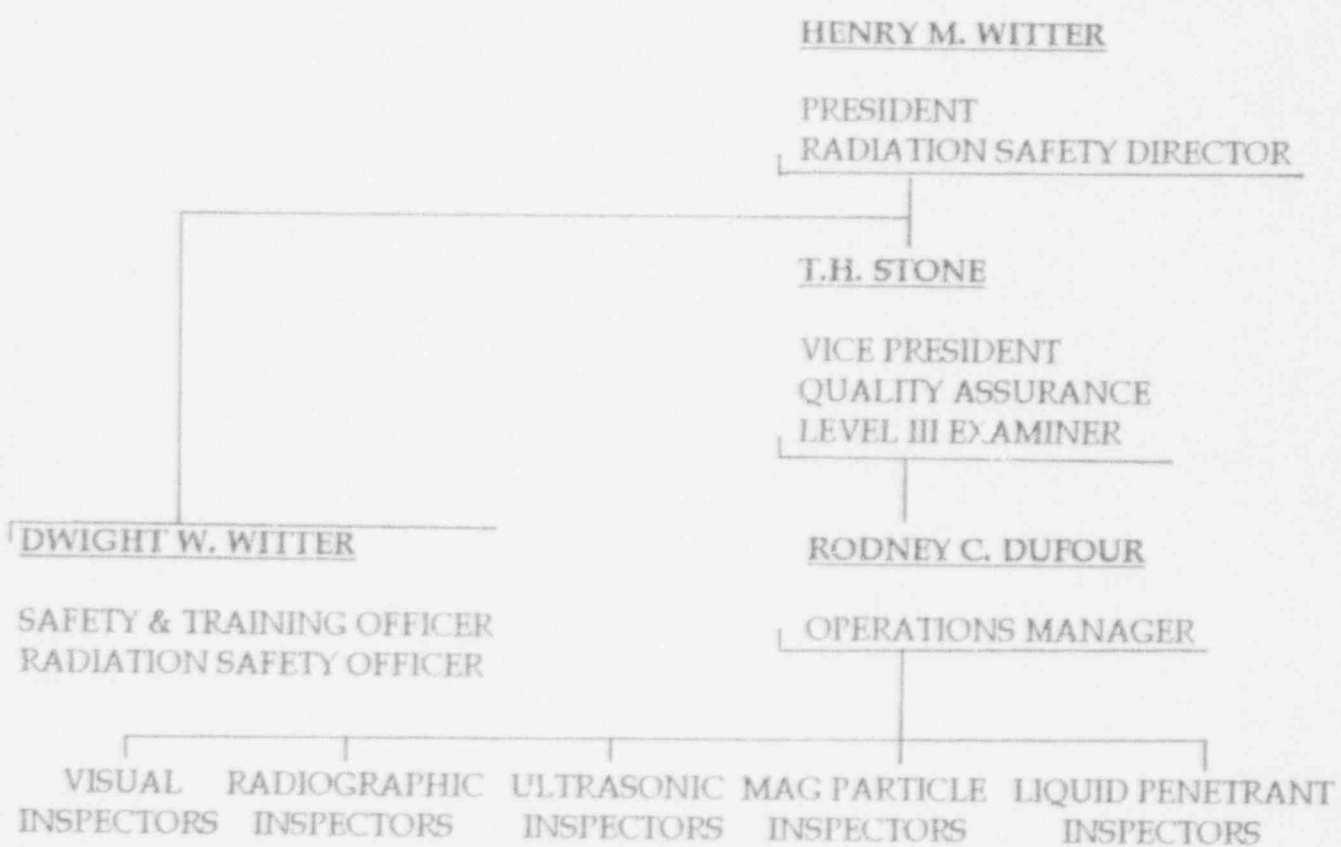


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**INSPECTION SPECIALISTS, INC.
QUALITY ASSURANCE PROGRAM**

1. ORGANIZATION

The final responsibility for the Quality Assurance Program for Part 71 Requirements rests with INSPECTION SPECIALISTS, INC. Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The Quality Assurance Program is implemented using the following organization:



**INSPECTION SPECIALISTS, INC.
ORGANIZATIONAL MANNING CHART**

INSPECTION SPECIALISTS, INC. QUALITY ASSURANCE PROGRAM

The Radiation Safety Director is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiation Safety Officer is responsible for maintaining radiation dosage records, procurement, maintenance and disposal of licensed material, calibration of monitoring equipment, maintenance of storage facilities and equipment, inventory of radiographic material, control of emergency situations, monitoring field operations and personnel training.

The Radiographers are responsible for handling, storing, shipping, inspection, test, operating status and record keeping.

2. QUALITY ASSURANCE PROGRAM

The management of INSPECTION SPECIALISTS, INC. establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagement in these functions, is required according to written procedures. QA Program revisions will be made according to written procedures with management approval. The QA Program will ensure provisions of the package design approval are satisfied. The QA Program will emphasize control of the characteristics of the package which are critical to safety.

The Radiation Safety Officer shall assure that all radioactive material shipping packages are designed and manufactured under a Quality Assurance Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after 1 January, 1979.

3. DOCUMENT CONTROL

All documents related to a specific shipping package will be controlled through the use of written procedures. All document changes will be performed according to written procedures approved by management.

The Radiation Safety Officer shall insure that all QA functions are conducted in accordance with the latest applicable changes to these documents.

INSPECTION SPECIALISTS, INC.
QUALITY ASSURANCE PROGRAM

4. HANDLING STORAGE AND SHIPPING

Written safety procedures concerning the handling, storage and shipping of packages for certain special form radioactive material will be followed. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed. Work instructions will be provided for handling, storage and shipping operations.

Radiography personnel shall perform the critical handling, storage and shipping operations.

5. INSPECTION, TEST AND OPERATING STATUS

Inspection, test and operating status of packages for certain special form radioactive material will be indicated and controlled by written procedures. Status will be indicated by tag, label, marking or log entry. Status of non conforming parts or packages will be positively maintained by written procedures.

Radiography personnel shall perform the regulatory required inspections and tests in accordance with written procedures. The Radiation Safety Officer shall ensure that these functions are performed.

6. QUALITY ASSURANCE RECORDS

Records of package approvals (including references and drawings), inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written procedures will also be maintained.

These records will be maintained in accordance with written procedures. The records will be identifiable and retrievable. A list of these records, with their storage locations, will be maintained by the Radiation Safety Officer.

INSPECTION SPECIALISTS, INC.
QUALITY ASSURANCE PROGRAM

7. AUDITS

Established schedules of audits of the Quality Assurance Program will be performed using written checklists. Results of audits will be maintained and reported to management. Audit reports will be evaluated and deficient areas corrected. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once per year. Audit reports will be maintained as part of the quality assurance records. Members of the audit team shall have no responsibility in the activity being audited.



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3 March, 1993

Mr. Charles E. Mac Donald, Chief
Transportation Branch
Division of Safeguards and Transportation
Nuclear Material Safety & Safeguards
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Mac Donald:

In accordance with 10 CFR 71.72(c).(3) INSPECTION SPECIALISTS, INC., Louisiana License No. LA 4266-LO1, requests to be registered as a user of the following equipment:

*Source Production & Equipment Co.
Model - SPEC 2-T*

Package Identification Number - USA/9056/B(u)
Certificate of Compliance Number - 9056
Issued to Source Production & Equipment Co., Kenner, LA

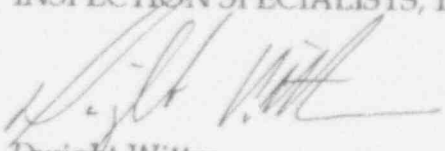
*Amersham Corporation
Model No. - 50A*

Package Identification Number - USA/9126/B(u)
Certificate of Compliance No. - 71-9126
Issued to Amersham Corporation, Burlington, MA.

Copies of the above referenced certificates of compliance are on file at INSPECTION SPECIALISTS, INC. office.

Sincerely,

INSPECTION SPECIALISTS, INC.


Dwight Witter
Safety & Training Officer

DW:sh

9303190253

**QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES**

0102

REVISION NUMBER

5

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2, the Quality Assurance Program identified in Item 5 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME Source Production and Equipment Company, Inc.			3. EXPIRATION DATE July 31, 1996	
STREET ADDRESS 113 Teal Street			4. DOCKET NUMBER 71-0102	
CITY St. Rose	STATE LA	ZIP CODE 70087		
5. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S) November 4 and 16, 1988, and May 25, 1991				
6. CONDITIONS				

Activities conducted under applicable criteria of Subpart H of 10 CFR Part 71 to be executed with regard to transportation packages.



FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Charles E. MacDonald
Charles E. MacDonald

AUG 1 1991

CHIEF, TRANSPORTATION BRANCH
DIVISION OF SAFEGUARDS AND TRANSPORTATION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

DATE

10-44 1101 TO 915043488001 P.07
QUALITY ASSURANCE PROGRAM APPROVAL
FOR RADIOACTIVE MATERIAL PACKAGES

0040
 REVISION NUMBER

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2 the Quality Assurance Program identified in Item 5 is hereby approved. This approval is issued to satisfy the requirements of Section 71.101 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

2. NAME Amersham Corporation			3. EXPIRATION DATE October 31, 1994	
STREET ADDRESS 40 North Avenue			4. DOCKET NUMBER 71-0040	
CITY Burlington	STATE MA	ZIP CODE 01803		
5. QUALITY ASSURANCE PROGRAM APPLICATION DATE(S) June 12, 1985 and October 3, 1989				
6. CONDITIONS				

Activities conducted under applicable criteria of Subpart H of 10 CFR Part 71 to be executed with regard to transportation packages for radioactive material in special form.



FOR THE U.S. NUCLEAR REGULATORY COMMISSION
Charles E. MacDonald
 Charles E. MacDonald

OCT 24 1989

CHIEF, TRANSPORTATION CERTIFICATION BRANCH
 DIVISION OF FUEL CYCLE AND MATERIAL SAFETY
 OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

DATE