

DEPARTMENT OF THE NAVY
NAVAL UNDERSEA WARFARE ENGINEERING STATION
KEYPORT, WASHINGTON 98345

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From: Commanding Officer, NAVUSEAWARENGSTA Keyport, Washington

To: Director
Division of Technical Inspection
United States Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, CA 94596

Subj: NRC Inspection

Ref: (a) NRC Region V ltr regarding License No. 46-09611-01 of 13 Nov 1981

1. Reference (a) provided the results of an inspection conducted by your office of the activities authorized by NRC License No. 46-09611-01. As required by reference (a) and in accordance with the provisions of 10 CFR 2.201, the Naval Undersea Warfare Engineering Station (NUWES), Keyport, Washington is hereby submitting the requested reply.

2. Appendix A of reference (a) detailed the specific items of noncompliance. The following statements deal with these items, as denoted in that appendix:

A - Lack of Internal Inspections

As was noted by the inspector, the Cobalt-60 was only used four times since the last inspection and no inspections of radiographer performance were conducted during those operations. However, during the quarterly maintenance inspections, the radiographers normally conduct the maintenance inspection, and the Radiation Safety Officer (RSO) observes and records the results in the log. The actions required of the radiographers during these inspections encompass most of the practical examination requirements detailed in enclosure (11) of our letter of 3 October 1977. In the future, the method of conducting quarterly inspections will be modified to include all of the elements of the examination to ensure proper compliance with 10 CFR 34.11 (d), and the record of the results of these inspections will be maintained for NRC review. This will ensure that as a minimum, quarterly radiographer performance inspections are conducted. In addition to the above actions, a memorandum has been issued to the personnel utilizing the Cobalt-60 source for radiography, requiring them to notify the RSO of any impending utilization of the source so that the RSO will be afforded the opportunity to conduct internal inspections during actual operations.

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B.1 - Refresher Training

As stated, no refresher training was conducted by the RSO during the period stated. However, the radiographers were not without some training during that period. The radiographers covered in the license during this period were given refresher training in February of 1980 and February of 1981. They took the 8-hour refresher training each year on Radiation Safety sponsored by the American Society for Nondestructive Testing. The failure of the RSO to conduct additional training and administer the tests resulted from the mistaken assumption that this training was an acceptable alternative to the RSO training. The 3 November inspection has clarified the need to modify the license to specify the ASNT course as an authorized alternate refresher course for License No. 46-09611-01. Since the inspection, the RSO has held the refresher training specified and administered the examination. Until the amendment is submitted and acted upon by the NRC, the ASNT course will not be considered a substitute for the RSO refresher course specified in the license.

B.2 - Monthly Film Badge Reports

During your inspection, the individual at the Dispensary assigned to monitor the medical aspects of our radiation program was at a NUWES detachment and not available to clarify the results stated in reference (a). A post inspection discussion between this Medical Department corpsman and the RSO showed that monthly film badge service has been received from the Radiological Safety Department, National Naval Medical Center, Bethesda, Maryland. The apparent discrepancy between the actual records and those reviewed by the inspector was due to the practice by the corpsman of making entries in the medical records for individuals with monthly 00.000 Rem doses at 2 or 3-month intervals. If an individual had a measurable dose, the dosage was recorded during the month the exposure occurred and the RSO was notified of the exposure. The monthly reports are maintained on file in the dispensary. As suggested during the inspection, to ensure proper review, the Medical Department has been instructed to forward a copy of each monthly exposure report to the RSO when it is received from Bethesda. In addition, the RSO will periodically review the recording of the results in personnel records.

3. The above corrective actions deal specifically with the items of noncompliance, and also reflect an effort to ensure proper implementation of the management control system and improve the overall effectiveness of that system. It is believed that reemphasis of managerial control by all personnel concerned with the license will minimize the potential for any recurrence of items of noncompliance such as were observed during your inspection.

4. The following statement of affirmation by the Radiation Safety Officer, Mr. Rodney M. Reed, is submitted as required by reference (a) under authority of Section 182 of the Atomic Energy Act of 1954:

"I certify that all information contained in this letter is true and correct to the best of my knowledge and belief."

12/3/81
Date

Rodney M. Reed
Signature

Radiation Safety Officer

Title

Subscribed and sworn before me this 3rd day of December 1981 at Keyport, Washington.

exp 3-1-83

John P. Cochran
JOHN P. COCHRAN
Notary Public
State of Washington

5. If any further assistance is required, please contact Mr. Rodney Reed on Autovon 744-4142 or Commercial (206) 396-4142.

C. H. Wilbur
C. H. WILBUR