

HIGH STEEL STRUCTURES, INC.



P.O. Box 10008
Lancaster, Pennsylvania 17605-0008
Phone 717/299-5211

A Division of High Industries, Inc.

May 14, 1990

United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA 19406

Attention: Mr. John R. White

Gentlemen:

Reference: Routine inspection No. 030-12926/90-001
of License No. 37-17534-01

On April 9 and April 10, 1990, Mr. Ladun, NRC Region 1 inspector, visited High Steel Structures, Inc. at the Lancaster and Williamsport plants to conduct a routine safety inspection and the activities as they relate to our license.

His inspection and interviews were pleasant and provided us with some informative suggestions and found us to be in compliance in all areas examined except the requirements in 10CFR34-28(b) and 10CFR34.31(a)(4) as stated in Appendix A attached to your letter of April 21, 1990.

1. 10CFR34.31(a)(4) requires that a licensee shall not permit any individual to act as a radiographer until such individual successfully completes a field examination on the subjects covered.

The circumstances that resulted in this violation are attributed to a lack of proper documentation. The individual cited in this violation acted as a radiographer for the first time on February 16, 1990. Prior to that date, on February 21, 1990, he was given a field examination as part of the ASNT certification program by a third party. This examination was conducted under the direct supervision of the assistant radiation safety officer. However, at that time a standard field examination report was not filled out.

To insure that proper documentation is maintained for future radiographers, the enclosed check off list will be utilized to insure that all requirements are met and documented. Full compliance with the requirements of 10CFR34 was achieved March 14, 1990.

RECEIVED-REGION 1
MAY 21 1990

United States Nuclear Regulatory Commission
May 14, 1990
page 2

2. 10CFR34.28(b) requires that the licensee conduct a program for inspection and maintenance of radiographic exposure devices, storage containers, and source changers at intervals not to exceed three months. This requirement was met in the quarterly inspection but the records lacked the documentation of the actual inspection. To satisfy this requirement, attached is a check list to our Quarterly Inventory Log to be used during the quarterly inspection. Compliance with this requirement was achieved on April 11, 1990.

If you have any additional questions, please call me.

Sincerely,



Patrick P. Loftus
President

jdl:eyh

Enclosure

RADIATION SAFETY TRAINING

NAME: _____

SOC. SEC. NO. _____

TRAINEE

Four weeks initial training covering the following topics:

- a. NRC Requirements
- b. Procedures
- c. Proper Handling Methods
- d. Maintenance & Safety

DATE COMPLETED _____

RADIATION SAFETY SCHOOL - 40 Hours

DATE COMPLETED _____

ASSISTANT RADIOGRAPHER'S TEST - MIN. 85%

DATE COMPLETED _____

ON THE JOB TRAINING - BY RSO/ASST. RSO

DATE COMPLETED _____

ASSISTANT RADIOGRAPHER'S PRACTICAL EXAMINATION

DATE COMPLETED _____

FORTY HOURS TRAINING - OPERATING AND EMERGENCY PROCEDURES
ON THE JOB TRAINING WORKING WITH A QUALIFIED RADIOGRAPHER

DATE COMPLETED _____

THREE MONTHS EXPERIENCE AS ASST. RADIOGRAPHER AND FIFTEEN HOURS
CLASSROOM TRAINING ON THE CODE OF FEDERAL REGULATIONS

DATE COMPLETED _____

RADIOGRAPHER'S TEST - 85% Min.

DATE COMPLETED _____

RADIOGRAPHER'S PRACTICAL EXAMINATION

DATE COMPLETED _____

Quarterly Inspection +
QUARTERLY INVENTORY LOG
OF RADIOACTIVE SOURCES

(SEE ATTACHED)

<u>DATE</u>	<u>ISOTOP TYPE</u>	<u>SOURCE SERIAL NO.</u>	<u>CAMERA SERIAL NO.</u>	<u>ACTIVITY IN CURIES</u>	<u>RECORDED BY</u>
-------------	------------------------	------------------------------	------------------------------	-------------------------------	--------------------

3/28/89

Ir-192

2021

301

43ci

DEH

6/28/89

Ir-192

2062

301

61ci

DEH

9/28/89

Ir-192

2099

215

87ci

DEH

12/28/89

Ir 192

2099

215

37ci

DEH

3/27/90

Ir 192

2139

317

46ci

DEH

4/11/90

Ir 192

2139

317

42ci

DEH

CAMERA

317

SOURCE SHIELD ASSEMBLY

A) Radiation Survey
less than 50MR/HR @ 6"B) Visual Inspection
No loose or missing
activator fastenings.

INTACT SAFETY WIRING

SECURE AND LEGIBLE
NAME PLATE

LOCK OPERATION

CONTROL ASSEMBLY

A) Visual Inspection

B) Leak Test with
Control Off

SYSTEM CHECK

A) With Locked Pro-
jectorB) With Unlocked Pro-
jector

REMARKS:

Quarterly
MAINTENANCE
CHECKLIST

Camera Serial No.

SOURCE SHIELD ASSEMBLY

A) Radiation Survey

(less than 50MR/HR @ 6")

B) Visual Inspection

No loose or missing
activator fastenings.

INTACT SAFETY WIRING

SECURE AND LEGIBLE
NAME PLATE

LOCK OPERATION

CONTROL ASSEMBLY

A) Visual Inspection

B) Leak Test with
Control Off

SYSTEM CHECK

A) With Locked Pro-
jector

B) With Unlocked Pro-
jector

Inspection by:

Date

Quarterly
MAINTENANCE
CHECKLIST

Quarterly maintenance to be completed in March, June, Sept., Dec.