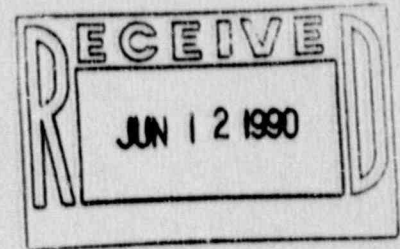


8900 Fairbanks North Houston Road
P.O. Box 40066
Houston, Texas 77240
713 466 7581

June 7, 1990

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX. 76011



Attn: A. Bill Beach, Director
Division of Radiation Safety and Safeguards

Subject: License: 42-13553-02
Docket: 30-09727/90-01
Notice of Violation
Transmittal of May 7, 1990

Gentlemen:

My apologies for failure to identify the reasons why violation 1 and violation 2 occurred.

Violation 1

The reason that this violation occurred was failure by the District RSO to ensure that worn film badges were being forwarded to the supplier in sufficient time to be processed before the six month badge expiration date and reported properly by the film badge supplier. In addition to the original corrective action, all district radiation safety officers have been instructed to order fewer film badges at one time so as to prevent the occurrence of late submittal of badges to the processor.

Violation 2

The reason this violation occurred was failure of the district radiation safety officer to maintain an adequate surveillance of the film badge exposure records of his personnel. This, in turn, was followed by inadequate surveillance of these records by the RSO and/or ARSO. In addition to comparison of the monthly reports and NRC 5 forms to the film badge assignment sheets, the utilization logs are reviewed to determine if the film badge reports include all the personnel doing radiography.

9007160254 900711
REG4 LIC30
42-13553-02 PDC

IC-90-181

IE07

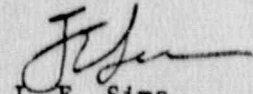
Page 2

Violation 3

Our manual has already been revised to comply with 10 CFR 34.11(d) as you suggested.

Should you have any additional questions, please contact myself, our RSO, Mr. Charles N. Sherlock or our ARSO, Mr. R. W. Kruzic at (713) 896-3776, 3769 or 3772.

Sincerely,



J. E. Sims
General Manager, Welding & QA

In Reply Refer To:
License: 42-13553-02
Docket: 30-09727/90-01

MAY 7 1990

CBI Industries, Inc.
ATTN: W. D. Colbert
Vice President
P.O. Box 692001
8900 Fairbanks North Houston Road
Houston, Texas 77269-2001

Gentlemen:

This acknowledges receipt of your letter dated March 26, 1990, in response to our letter and attached Notice of Violation dated February 15, 1990. We have reviewed your reply and find that additional information is needed.

During our review, we noted that you have not fully responded in every case to each of the four items specified on page 2 of the Notice of Violation. Consequently, we have summarized those violations requiring further response from you as shown below. Your response to this letter should be provided to this office within 10 days of your receipt of this letter.

Violation 1

Although your response indicates that you have taken adequate corrective action for this specific occurrence, it does not indicate that you have identified the reason that this violation occurred. Your identification of the underlying cause that resulted in the failure to have conducted the required occupational radiation dose evaluations is a prerequisite to your developing procedures that will prevent future recurrence of similar violations. Your response to this item should identify your conclusion as to why the violation occurred so that we may determine whether your proposed corrective action will be effective in preventing further violations.

Violation 2

Although your response indicates that you have implemented corrective steps that will address the record retention requirements for those individuals currently employed by CBI Industries, Inc., it does not indicate that you have determined the reason for this violation having occurred. This is necessary for you to ensure that your proposed corrective actions are effective in preventing further violations of this requirement. Specifically, we are uncertain whether your comparison of monthly vendor reports to the quarterly NRC Form-5 reports would identify that you had failed to maintain exposure records for new employees or individuals for whom an NRC Form-5 had not yet been received.

RIV:NMIS: *[Signature]*
LKasner:cd
5/4/90

C:NMIS: *[Signature]*
CLCain
5/4/90

D:DESS: *[Signature]*
ABBoon
5/4/90

9005110723
210

IE07

CBI Industries, Inc.

-2-

Your reply to this item should identify: (1) the reason for the violation having occurred and (2) the corrective steps which will be taken to avoid further violations.

Violation 3

Your response indicates that upon further review, you have determined that two of the radiographers noted in the violation had not been using byproduct material but had been working with standard x-ray equipment during these periods. This information was not made available during the inspection.

Based on our review of this information and in accordance with your previously authorized operating procedures, this violation will be withdrawn. Your proposed procedure change appears adequate to meet the requirements of 10 CFR 34.11(d); however, you should include this proposed procedure change with future requests for amendment or renewal of the license.

Should you have any questions regarding this matter please contact Linda L. Kasner at (817) 860-8100.

Sincerely,

Original Signed By:

A. B. BEACH

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
Texas Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (4503)
CLCain
WLFisher
Inspector
NMIS
MIS System
RIV Files (2)
RSTS Operator
REHall, URFO