

VISI VALLEY INSPECTION SERVICE INC.

030-31172

September 20, 1990

NUCLEAR REGULATORY COMMISSION
Region 1
475 Allendale Road
King of Prussia, Pennsylvania 19406

Subject: ROUTINE INSPECTION NO. 030-31172/90-001

Gentlemen:

During this routing inspection of July 19, 1990, Mr. Anthony Kirkwood cited VALLEY INSPECTION SERVICE with three (3) violations as stated below:

10 CFR 71.5(a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Part 170-189.

49 CFR 172.202(a)(1), (2) and (3) requires that each description of a hazardous material in a shipping paper include the following: the proper shipping name prescribed for the material by 172.101 or 172.102, the hazard class, and the identification number.

42 CFR 172.203(d)(vii) requires that each description of a hazardous material in a shipping paper include a notation of the package identification marking as prescribed in the USNRC approval.

VALLEY INSPECTION SERVICE Management in conjunction with our R.S.O. has reviewed Section 14 of our manual for packaging and labeling requirement for transportation of radioactive material via VISI vehicle and common carrier:

Section 14, Para. 3.1.1a of VISI Manual - Proper shipping name when containing source is radioactive material special Form N.O.S. Identification No. UN2974 (Per 49 CFR 172.101 Hazardous Material Table)

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REG1 LIC30
37-28385-01 PNU

Radiographic, Magnetic Particle,
Penetrant & U.T. Testing

P.O. Box 3245, Palmer, PA. 18042 • Phone: 215-250-6444

SEP 24 1990

NUCLEAR REGULATORY COMMISSION
King of Prussia, Pennsylvania 19406

September 20, 1990
Page 2

Section 14, Para. 3.1.3 of VISI Manual - The U.S.N.R.C. Certificate of Compliance Number for Amertest 660 I.R.-192 Camera - USA/9033/B(u) Type B(u)

NOTE: The hazard class need not be stated since it is contained in the proper shipping name as per 49 CFR 172.202(a)(2).

Section 14, Para. 7.1.5 of VISI Manual - D.O.T. Shipping Certificate Attachment R6 shall be completed for each movement via VISI vehicle.

Corrective Action

Full compliance with NRC requirements was achieved the same day as the inspection by adding the proper shipping name and number, along with the proper package identification number to VISI D.O.T. Shipping Certificate Attachment R6.

Section 14, Para. 7.1.5 D.O.T. Shipping Certificate Attachment R6 has been modified to reflect the following proper shipping name when containing source:

Radioactive Material Special Form N.O.S. Identification Number UN2974, and U.S.N.R.C. Certificate of Compliance Number USA/9033/B(u) Type B(u)

(See Attachment R6, Rev. 1 attached.)

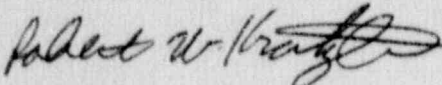
Preventative Action

With the modification to D.O.T. Shipping Certificate as listed above, reoccurrence of these violations will be prevented.

In compliance with our agreement with Mr. Kirkwood on July 19, 1990, the blockhouse located at the 25th & Lennox Streets address has been outfitted with entrance control system as specified in 10 CFR 34.129.

Very truly yours,

VALLEY INSPECTION SERVICE, INC.



Robert W. Kratzer
President

RWK:hmc/VIS#2/12

VISI VALLEY INSPECTION SERVICE INC.

R-6

DEPARTMENT OF TRANSPORTATION (D.O.T.) SHIPPING CERTIFICATE

RQ RADIOACTIVE MATERIAL SPECIAL FORM N.O.S. UN2974.

1. N.R.C. PACKAGE APPROVAL NO. USA/9033/B(U) TYPE B(U)

2. TRUCK / VEHICLE NO. _____ DRIVER _____

3.A. RADIATION SURVEY READING AT SURFACE OF TRANSPORT CONTAINER
_____MR

B. TRANSPORT INDEX (0.1 to 10.0) _____MR

C. LABEL: CLASS 1 _____ CLASS 2 _____ CLASS 3 _____

4. () MOBILE LAB () PRIVATE () COMPANY CAR

5. MR LEVEL AT DRIVER _____MR. MR LEVEL AT PASSENGER _____MR.

6.A TYPE OF RADIOACTIVE MATERIAL: () IR-92 () CO.-60 () OTHER

B NO.OF CURIES _____ TYPE PROJECTOR/SOURCE CHANGER _____

C CAMERA NO. _____SOURCE S/N _____

NOTE: A The radioactive material and vehicle covered in this certificate is considered "SOLE USE" for VALLEY INSPECTION SERVICE INC.

NOTE: B It is the responsibility of the radiographer to complete this form for shipment of radioactive material used in "SOLE USE" Vehicle for VALLEY INSPECTION SERVICE INC.

RADIOGRAPHER

DATE

rev 1
p91

*Radiographic, Magnetic Particle,
Penetrant & U.T. Testing*

P.O. Box 3245, Palmer, PA. 18042 • Phone: 215-250-6444



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

Docket No. 030-31172

AUG 24 1990

License No. 37-28385-01

Valley Inspection Service, Incorporated
ATTN: Robert W. Kratzer
President
P.O. Box 3245
Palmer, Pennsylvania 18047

Gentlemen:

Subject: Routine Inspection No. 030-31172/90-001

On July 19, 1990, Anthony Kirkwood of this office conducted a routine safety inspection at the above address and at the Oliver Co., Alpha, New Jersey of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with you and Kerry Frack at the conclusion of the inspection.

At the exit interview, the licensee stated that they would not operate the blockhouse, at the 25th and Lennox Streets address, as a temporary field site after 60 days. After that time, entrance controls as specified in 10 CFR 34.29 will be in place.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

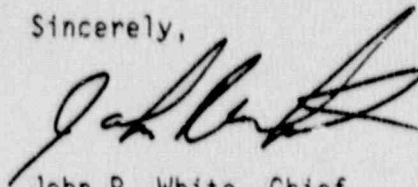
The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

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Valley Inspection Service, Incorporated 2

Your cooperation with us is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. White". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John R. White, Chief
Nuclear Materials Safety Section C
Division of Radiation Safety
and Safeguards

Enclosure:
Appendix A, Notice of Violation

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
Kerry Frack, Radiation Safety Officer

APPENDIX A

NOTICE OF VIOLATION

Valley Inspection Service, Inc.
Palmer, Pennsylvania 18043.

Docket No. 030-31172
License No. 37-28385-01

As a result of the inspection conducted on July 19, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1988), the following violation was identified:

10 CFR 71.5(a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Part 170-189.

49 CFR 172.202(a)(1), (2) and (3) requires that each description of a hazardous material in a shipping paper include the following: the proper shipping name prescribed for the material by §172.101 or §172.102, the hazard class, and the identification number.

49 CFR 172.203(d)(vii) requires that each description of a hazardous material in a shipping paper include a notation of the package identification marking as prescribed in the USNRC approval.

Contrary to the above, on July 19, 1990, 58 curies of iridium-192 was transported in the licensee truck to Alpha, New Jersey without a complete description of the hazardous material on the shipping paper. Specifically, the proper shipping name, hazard class, identification number and package identification marking was not included on the shipping paper.

This is a Severity Level IV violation. (Supplement V)

Pursuant to the provisions of 10 CFR 2.201, Valley Inspection, Service, Incorporated is hereby required to submit to this office within thirty days of the date of the letter which transmitted this Notice, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending this response time.

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