

CONAM INSPECTION

1245 West Norwood
Itasca, Illinois 60143
(312) 773-9400

April 14, 1982

United States
Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Richard C. DeYoung, Director
Office of Inspection and Enforcement

Re: License No. 42-16559-01
EA 82-27

Gentlemen:

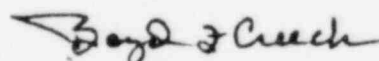
This letter is submitted in response to your letter of March 16, 1982 to request that the proposed fine of \$9,000 be reduced by \$4,000.

We note that consideration was given by the Commission to the fact that CONAM documented the violations listed as IB and IC. With respect to these violations, it is requested that fines not be assessed because historically the Commission has not assessed a penalty with respect to licensee identified and documented incidents not resulting in over-exposures.

With respect to violation IA, we are particularly concerned that the Commission not overlook CONAM's good record of many years. CONAM's Radiation Safety Director, its President and the individual to whom he reports have all been with the company for some 15 years and cannot recall a single incident where the management of CONAM or of its individual facilities have been accused of coaching an employee to cover up an incident, withholding information from the Commission, discouraging employees from contacting the Commission, back-dating records or otherwise being anything but honest and forthright in dealings with the Commission. This is the more remarkable given the fact that CONAM is one of the largest radiographic companies in the United States. It may also be noted that CONAM's own investigation did not establish prior knowledge by the Folcroft manager about any of the listed violations.

We respectfully request that all of the above be taken into consideration by the Commission in making a final determination of the amount of the fine to be assessed.

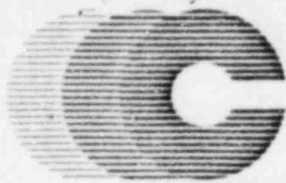
Very truly yours,
CONAM INSPECTION


Boyd F. Creech
President

BFC:bb

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42-16559-01 PDR

Copy for
Glenn Brown



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I CERTIFY ALL INFORMATION CONTAINED IN THIS CORRESPONDENCE PLUS
ANY SUPPLEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Boyd J Creech

NAME

PRESIDENT

TITLE

CONAM INSPECTION

COMPANY

April 14, 1982

DATE