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# CONSOLIDATED NDE, INC.

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November 16, 1990

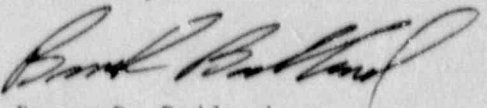
Docket No. 030-20787  
License No. 29-21452-01  
EA 90-060

Director, Office of Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: DOCUMENT CONTROL DESK  
SUBJECT: RESPONSE TO ALLEGED VIOLATION E-1  
REFERENCE: USNRC LETTER DATED OCTOBER 17, 1990

Dear Mr. Lieberman:

Attached please find our response to your request made in the above referenced letter. Consolidated NDE, Inc. disagrees with the NRC interpretation for the reasons stated in the attachment. Should NRC continue to disagree with our position, we feel it is appropriate to request a meeting on this matter.

Sincerely,  
  
Bruce R. Ballard  
Radiation Safety Officer

cc: Regional Administrator  
USNRC Region I  
King of Prussia, PA 19406

Attachment

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REG1 LIC30  
29-21452-01 PDC

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IE: 14



**CONSOLIDATED  
NDE INC.**

ATTACHMENT

RESPONSE TO ALLEGED VIOLATION E.1

CONSOLIDATED NDE, INC. RESPONSE

Section II, page 2, Item C of the Consolidated NDE Inc. Operating and Emergency Procedures Manual states that "Additional radiation area surveys shall be performed each time a handling procedure varies which will change the previously established output perimeter."

It is important the NRC understand routine nondestructive examination operations of this type. In setting up a routine gamma radiographic examination for the pipe circumference, three separate exposures are usually planned. In determining the restricted area boundary, the radiographer makes a determination of the "worst case" exposure for the entire required examination. A boundary is established to insure that additional exposures do not produce radiation levels, outside the boundary, in excess of the allowable limits. The other two exposures will, therefore, not change the established radiation output perimeter. Hence, Consolidated NDE, Inc. has met the condition and intent not only of this procedural requirement, but also 10 CFR 20.201 with respect to 10 CFR 20.105. Specifically, by this "worst case" evaluation (survey), Consolidated NDE, Inc. ensures compliance with the permissible radiation levels in unrestricted areas. This methodology has been explained and accepted by the NRC during past inspections.

If the NRC were to examine other NRC radiographic licensees, it would be found this is the standard industry manner in which pipeline radiographic operations are conducted. Any exposures which fall outside this parameter would require an additional survey(s). Examples of this would be:

Moving the collimated source off the weld circumference under examination to another weld or area that was not previously planned for in setting up the restricted area.

Relocating the collimated source to another area where the radiographic examination produces different radiation scattering characteristics i.e. different pipe diameter, pipe wall thickness, collimation, or exposure technique.

Relocating the collimated source to another area where the shielding characteristics have changed, i.e. from below ground to above ground.

It should be noted that the NRC found no violations of 10 CFR 20.105 during this inspection. Therefore, violation E.1 is denied.