



Industrial NDT Company

INCORPORATED

QUALITY ASSURANCE THROUGH NONDESTRUCTIVE TESTING

CORPORATE HEADQUARTERS

90 SEP 5

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(803) 744-7412

August 30, 1990

Mr. Stewart D. Ebnetter
Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
101 Marietta Street, N.W.
Atlanta, GA 30323

RE: Docket No. 030-29828
License No. 39-24888-01

Dear Mr. Ebnetter:

This correspondence has been generated as a resubmission of responses to violations which were found to be inadequate by the NRC.

I. Violation A - Civil Penalty

On March 22, 1990, INDT submitted to the NRC an internal investigation into the radiation incident which occurred on March 3, 1990. This report described in detail the events which led to the occurrence as well as the cause of the incident.

In the response dated 6/2/90, we stated this was a violation and the corrective measures taken to alleviate this situation.

I. Violation B

The response to violation B is in direct response to the phrase "the licensee did not ensure that a survey was made of the entire circumference of the radiographic exposure device including the source guide tube after a radiographic exposure". It is INDT's policy that the requirements of 34.43(b) be adhered. To ensure that this is accomplished, the licensee (INDT) provides all required instruments, training, procedures, as well as periodic on-site audits and reviews to assure that these requirements are met.

Failure to conduct the surveys as required by 34.43(b) is a violation. This violation was committed by the radiographer and does not reflect the policy nor the normal practices of INDT.

INDT will continue to assure that each radiographic personnel understands the requirements of 10 CFR 34.43(b) and complies as required, through INDT's established Radiation Safety Program, including training, field audits, and review practices.

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II. Violation B.3 - Failure to Take Names

INDT acknowledges that names were not taken as required by QCP 203 Rev. 5, Section 6.9.

In the event of future emergency situations, Industrial NDT will conduct its operations in accordance with INDT's Radiographic Emergency & Operating Procedures (QCP 203).

Violation B-4 - 10 CFR 20.201(b)

Industrial NDT acknowledges that the emergency situation created levels of radiation in an unrestricted area in excess of the requirements of 10 CFR 20.105(b). However, based on the information gathered, no unauthorized personnel were exposed to radiation levels in excess of the allowable limits.

The cause of this situation was a failure of the swage on the capsule. The Tech/Ops model 683 projector system is currently being replaced by INDT to alleviate the inherent problems associated with the 683 projector.

An effort will be made to notify individuals who may have been present at the location of the source disconnect. Industrial NDT Company will notify NRC Region II of any progress made in this effort within 90 days.

Violation C - Division RSO

Industrial NDT will submit to the NRC an amendment request to allow the Corporate Radiation Safety Officer to serve as Division Radiation Safety Officer for interim periods when the Division RSO's listed on INDT's license are no longer serving in these positions. This will be accomplished in the next 60 days.

In the event you have any questions concerning Industrial NDT Company's responses, please contact me at (803) 744-7412.

Sincerely,

Jerald W. Patterson
Corporate Radiation Safety Officer

CC: James Lieberman, Director
Office of Enforcement
Washington, D.C.