

Quality
5360 West 130th Street
Cleveland, Ohio 44142
Testing Inc.

September 13, 1982

United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: D. J. Sreniawski, Chief
Materials Radiation Protection
Section 2

Reference: Nuclear Regulatory Commission letter dated August 13, 1982.

Subject: License No. 34-17799-01

Gentlemen:

In reference to Notice of Violation, (appendix of letter dated 8/13/82) Quality Testing Inc., wishes to make the following reply. Paragraph #1 of the Notice of Violation addresses the requirement to document "Quarterly Safety Meetings". Although no documentation exist to verify compliance with this requirement, frequent discussions of topics related to Radiation Safety were held. Attachment #1, documentates the corrective action taken to achieve compliance with this requirement. Also the administration of Semi-Annual review tests is addressed in this paragraph (Paragraph #1). General tests of radiographic inspection technique, which includes radiation safety, where administered to all radiographers and assistance radiographers, as part of our Qualification Process. These tests although they include Radiation Safety questions, were not directly traceable to specific dates and did not address Radiation Safety as a seperate issue. Attachment #2 and #3, documents Corrective action. Both Radiographers John Wicktora, and Assistance Radiographer Wanda Wilson, answered the ten test questions correctly.

Action taken to avoid further noncompliance in these matters is contained for your comment in attachment #6, Radiation Safety Documentation Check List for Radiographers and Assistance Radiographers. This form details time frame for compliance with requirements addressed in the Notice of Violation.

Paragraph #2, of Notice of Violation, refers to "Unscheduled Surveys" of each Radiographer and Assistance Radiographer. The majority of Radiographic Operations conducted by Quality Testing, Inc., are carried out at the current company address. The Radiation Safety Officer, is present during most of these operations and is constantly accessing the safe handling of licenced materials and the requirements for surveys, posting, and restricting radiation areas and personnel safety in general.

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September 13, 1982

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The above notwithstanding no documentation of "Unscheduled Surveys" were made. To correct this deficiency forms RS-10 were completed at a field location on September 3, 1982. Our Radiographer and Assistance Radiographer were operating in compliance with our license requirements. See attached forms marked #4 and #5. Again attachment #6, Radiation Safety Documentation Check List for Radiographers and Assistance Radiographers, is intended to avoid further non-compliance in this matter.

Full compliance with license requirements addressed in the Notice of Violation, can be achieved upon approval by the Nuclear Regulatory Commission, of the corrective action taken by Quality Testing, Inc., in the above statements. If clarification and or additional information are required, please feel free to contact the undersigned.

Sincerely,



Daniel J. Masterson
Radiation Safety Officer

Enclosures

DJM:sb

SAFETY TRAINING

Conducted by

DJ Masterson

Date

9-2-82

Subjects presented:

ASO

QUARTERLY SAFETY MEETING

REVIEW OF CASE HISTORIES OF
RADIOGRAPHY INCIDENTS.

Attendees

DAN MASTERSON

JOHN WICKTORA

WANDA WILSON



5360 West 130th Street
Cleveland, Ohio 44142

J. Wicktor
(216) 433-4424

J. WICKTORA
9-3-82

100%
DPM
9-3-82

SEMI ANNUAL RADIATION SAFETY TEST

1. ✓ As a Radiographer (or Assistant), what is the maximum whole body radiation dose per calendar quarter?

1250 Mr / 1.25 REM

2. ✓ What is the permissible radiation level in an unrestricted area for any one hour period?

2 Mr

3. ✓ What radiation level constitutes a High Radiation Area?

100 Mr

4. ✓ During radiographic operations the exposure device must be kept LOCKED when not under direct surveillance by Radiographer or his Assistant.

5. ✓ During radiographic operations a survey of the exposure device is required after each exposure.

True or False TRUE

6. ✓ During radiographic operations anyone may maintain direct surveillance of the High Radiation Area.

True or False False

7. ✓ Operating & Emergency Procedures need not be "on site" for field radiographic operations.

True or False False

8. ✓ At 20 Ft. from a Ir 192 sealed source, the radiation level is 100MR/HR. What is the radiation level at 40 Ft.?

(A.) 200 MR/HR (B.) 50 MR/HR (C.) 25 MR/HR (D.) 12 MR/HR

C

J. WICKORA

9-382

ASO

9. An Assistant Radiographer may work alone if his equipment is checked by a Radiographer.

✓ True or False False

10. If distance cannot be used for shielding in the field, what can be?

Any dense material that is
available. Also you can move your source to create a shorter exposure.
OK Also a collimator could and should be used when possible.



Handwritten: Sandra Wilson (216) 433-4424
Sept. 10, 1982

Handwritten: 100%
DWM RSO
9-10-82

SEMI ANNUAL RADIATION SAFETY TEST

1. What radiation level constitutes a High Radiation Area?
 100 MR./HR.

2. If distance cannot be used for shielding in the field, what can be?
 DENSED METAL'S IF AVAILABLE - TIME
 WILL ALSO BE USED. - LEAD - CONCRETE - STEEL

3. What is the permissible radiation level in an unrestricted area for any one hour period?
 2 MR./HR.

4. An Assistant Radiographer may work alone if his equipment is checked by a Radiographer.
 True or False FALSE

5. During radiographic operations the exposure device must be kept LOCKED when not under direct surveillance by Radiographer or his Assistant.

6. As a Radiographer (or Assistant), what is the maximum whole body radiation dose per calendar quarter?
 1 1/4 Rem./per quarter

7. During radiographic operations anyone may maintain direct surveillance of the High Radiation Area.
 True or False FALSE

8. Operating & Emergency Procedures need not be "on site" for field radiographic operations.
 True or False FALSE

[Signature]
ASO

9. During radiographic operations a survey of the exposure device is required after each exposure.

✓ True or False TRUE

10. At 20 Ft. from a Ir 192 sealed source, the radiation level is 100 MR/HR. What is the radiation level at 40 Ft.?

✓ (A.) 200MR/HR (B.) 50 MR/HR (C.) 25 MR/HR (D.) 12 MR/HR

C - 25 MR/HR.

UNSCHEDULED SURVEY

Location LUBRIZOL PAINSVILLE, OH Date 9-3-82Conducted by R. MarksonRadiographer JOHN WICKTORA

Listed below are a few of the items that must be checked

	S	U
Adequate control of radiation area	✓	
Proper signs and barriers at the Radiation and High Radiation areas	✓	
Proper survey of gamma camera after each exposure	✓	
Proper filling out of form RS 8	✓	
Copy of safety manual on site	✓	
Proper usage of film badges and dosimeters	✓	

Comments:

COMPANY SAFETY PROCEDURES BEING
FOLLOWED:

UNSCHEDULED SURVEY

Location LUBRIZOL, PAINEVILLE, OH Date 9-3-82Conducted by J. MastersonRadiographer's ASSISTANT WANDA WILSON

Listed below are a few of the items that must be checked

	S	U
Adequate control of radiation area	✓	
Proper signs and barriers at the Radiation and High Radiation areas	✓	
Proper survey of gamma camera after each exposure	✓	
Proper filling out of form RS 8	✓	
Copy of safety manual on site	✓	
Proper usage of film badges and dosimeters	✓	

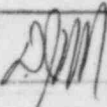
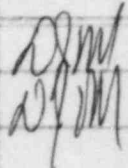
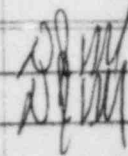
Comments:

COMPANY SAFETY PROCEDURES BEING
FOLLOWED.

RADIATION SAFETY DOCUMENTATION CHECK LIST

FOR

RADIOGRAPHERS AND ASSISTANCE RADIOGRAPHERS

FORM	FUNCTION	FREQUENCY	LAST DATE COMPLETE	DATE DUE	BY:
RS-9	<u>Quarterly Safety Meeting</u> All radiographers and assistance radiographers. D.J. Masterson W. Wilson J. Wicktora	one per calender quarter	9-2-82	12-1-82	
Semi-Annual Review	<u>10 Questiongs</u> <u>Radiation Safety Test</u> All radiographers and assistance radiographers.	semi-annual J. Wicktora W. Wilson	9-3-82	3-1-83	
RS-10	<u>Unscheduled Surveys</u> All radiographers and assistance radiographers.	one per calender quarter J. Wicktora W. Wilson	9-3-82	12-1-82	
			9-3-82	12-1-82	

ATTACHMENT #6