



Professional Service Industries, Inc.
Corporate Office

DCS

November 30, 1990

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

ANSWER TO NOTICE OF VIOLATION

Attention: Document Control Desk

Re: License No. 37-00276-25
Docket No. 030-05985
Inspection Report No. 88-02

Gentlemen:

Professional Service Industries, Inc. (PSI) is in receipt of the Notice of Violation dated October 30, 1990, in regard to violations cited as a result of an inspection of the PSI facility in Sharon Hill and project site in Phoenixville, Pennsylvania on 10/4/88. In response to the imposition of the civil penalty, PSI requests mitigation of the base penalty on the grounds that PSI's response was both prompt and comprehensive.

Prior to the NRC's investigation, PSI's corporate oversight program identified that the Sharon Hill RSO authorized the ARSO to sign his name on the radiographic personnel field audit forms. PSI recognized that the practice of the ARSO signing the RSO's name on the forms may be construed as records falsification and immediately instructed the ARSO to use his signature on the audit forms, as he was already qualified to do so.

PSI considers the allegations to be very serious in nature. Upon learning of the alleged violations, PSI's Corporate Radiation Safety Director and Corporate Counsel were immediately dispatched to the Sharon Hill office to investigate the circumstances of the allegations. It was at that time that PSI learned of the possibility of record falsification. PSI immediately suspended the ARSO's authorization for all assigned responsibilities and instructed the Sharon Hill office was to continue radiographic operations for only current contractual work. The Sharon Hill office was instructed not to pursue any new jobs involving radiography, and that radiographic operations at Sharon Hill were to remain in suspension until further notification. Although voluntary, the suspension of radiographic operations has caused substantial monetary loss, which should be considered in mitigating the civil penalty.

Immediately after the meeting in January, the radiographer's field audit form was reviewed and it was concluded that the format of the form did not incorporate any feature to discourage or detect falsification. The field audit form was revised to require the radiographic personnel's signature on the form to provide confirming evidence that the audit was performed. Also during that time, the radiography office corporate audit form was completely revised to require

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and document a more thorough corporate review of licensed operations at PSI offices. The preliminary changes to both forms were immediate and the forms were implemented at all PSI branch offices. Although revised corporate audit forms were being used in audits of PSI offices, the effectiveness of the revisions was still being evaluated at the time of the enforcement conference held in August, 1990. The final revision of the corporate audit form is now in use at PSI radiographic offices in NRC jurisdiction, as well as Agreement States. (A copy of a recent corporate audit performed using the final revised office audit form is enclosed with the accompanying "Reply to Notice of Violation".)

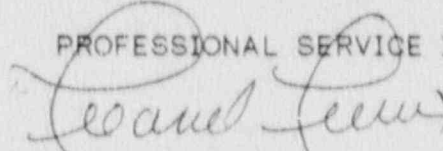
PSI considers the corrective actions indicated above both prompt and comprehensive, in that they were immediately initiated, based on NRC inquiries and the possibility of non-compliance, not on final NRC determinations or conclusions. In that regard, PSI requests NRC mitigation of the imposed civil penalty.

As indicated in the "Reply to Notice of Violation", PSI has not had the opportunity to review the full Office of Investigation report of the Sharon Hill investigation. In reviewing the transcript from the 08/21/90 enforcement conference, it appears the "hallway" conversation in which Mr. White indicated to Mr. Welland that a copy of the full Office of Investigation report would be sent to PSI was off the record. The transcript reflects that PSI was advised to contact the NRC Regional Counsel to obtain instructions on how to request a copy of the report. PSI will request a copy of the report in accordance with those instructions.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

PROFESSIONAL SERVICE INDUSTRIES, INC.



Leland Lewis, P.E.
Corporate Secretary

LL/JTT

cc: Regional Administrator
US Nuclear Regulatory Commission
Region I
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