

Pittsburgh-Des Moines Corporation

580 East 600 South (P.O. Box 1447) Provo, UT 84601 801-373-8150

LICENSE: 43-19915-01

August 24, 1982

AIG 3 0 1982

USNRC

ATTN: Mr. Glen D. Brown

611 Ryan Plaza Drive, Suite 1000

Arlington, Texas 76012

Gentlemen:

In response to the violations that Mr. R. C. Brown found in his routine safety inspection on June 24, 1982. The following corrective steps were taken.

Violation #1

We have had Quarterly Internal Inspections on

16-17 July 1981

22-23 Oct 1981

We missed the Quarterly Internal Inspections on

22 Jan 1982

22 Apr 1982

22 July 1982

To correct this violation an Internal Inspection was

performed on 10-11 Aug 1982.

See Attached Pages # 1A, 1B, 1C, 1D,

1E, 1F, 1G, 1H.

To avoid further violations, I made a Quarterly Internal Inspection Index Sheet to control and to remind us of

future inspections.

See Attached Page # 1I

Violation #2

We had four Radiographer Assistants during the period June 1981 to June 1982. I obtained a signed statement attesting to prior occupational dose from these Radiographer Assistants, except from Paul B. Heideman, he was trained but did not work as an Assistant.

See Attached Pages # 2A, 2B, 2C.

To avoid further violation to 10 CFR 20.102 (a), a training session was held on Aug 24, 1982 about this violation and our responsibility of obtaining signed statements from the people we hire attesting to their prior occupational dose.

See Attached Page #2D

8210220324 820928 NMS LIC30 43-19915-01 PDR

USNRC

- Violation #3 (a) We requested from Gamma Industries the Certificates of Compliance to meet the requirements of Paragraph 49 CFR 173.398 (a).

 See Attached Pages #3aA, 3aB
 A copy of these forms are included in our files for
- future receiving & snipping of Radioactive Materials.

 Violation #3 (b) We requested on July 1, 1981 to be registered in
- accordance with provisions of paragraph 71.12(b) of 10 CFR Part 71.

 See Attached Page #3bA

To avoid further voilation to these provisions we had a training session on Aug 24, 1982.

See Attached Page #3bB

- Violation #3 (c) We acquired a specification 7A package certification for type A material from Gamma Industries.

 See Attached Pages #3cA, 3cB, 3cC A copy of this certification is in our files for future receiving & shipping of Radioactive materials.
- Violation #4 Our Quality Assurance Program was approved on May 12, 1981.

See Attached Pages #4A, 4B

If you have any questions pertaining to this violation response please contact us at (801) 373-8150 Ext. 238.

Mariano Orozco

Asst. Radiation Safety

Officer

MiO:mp

RADIATION SAFETY

*** QUARTERLY AUDIT CHECKLIST ***

		Current	Deficient	COMMENTS
1.	Eye examinations	(X)	()	
2.	Su ve; meter cal.	. (X)	()	
3.	Dosimeter check	(×)	()	
4.	Film badge (date)	(X)	()	
5.	Dosimeter log	(×)	()	
6.	Quarterly invent	. (×)	()	
7.	Source wipe test	(×)	()	
8.	Film badge record	1 (X)	()	
9.	Rad. safety train	n.:		
	a. annual RSTP 18	%2 (×)	()	
	b. quarterly	()	(×)	LAST SAFETY TRAINING SESSSION WAS
10	. Training & Qual.			
	a. level I	(7)	()	
	b. level II	(X)	()	
11.	Radiographer rev	iew()	(×)	CRAIG CHILD & MARIANO OROZCO SHOULD BE REVIEW
12.	Assistant review	()	(×)	SAME A
13.	Source usage log	()	(×)	PADIOGOSPHERS PROSED ARE NOT USING THE INC.
14.	Receiving reports	s (×)	()	
15.	Transfer reports	(×)	()	
16.	Shipping reports	(×)	()	
17.	Exposure notifi- cation (annual)			
	a. Individual	(×)	()	
	b. N.R.C.	(*)	()	
18.	Termination repor	rts:	A. A. A. A.	
	a. Individual	(×)	()	
	b. N.R.C.	(X)	()	
19.	Previous audits	(x)	()	PAGE # 1 A

RADIATION SAFETY QUARTERLY AUDIT REPORT

REVIEW	WAS	HELD	ON	FER	15	1982		
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				BY: N	IARIANI	OROZCI	O DATE	:8/12/
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PAGE # 1B

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AUDIT FINDING: RADIOGRAPHERS	
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	BY: Maniso Orgo DATE: AUG II
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PAGE # 1C

QUATERLY RADIATION SAFETY REVIEW

te Performed	Date Due
AUG 24,1982	NOV 24,1982



Pittsburgh-Des Moines Corporation

580 East 600 South (P.O. Box 1447) Provo, UT 84601 801-373-8150

Aug 24 1982

Subject: Quaterly Radiation Safety Review

To comply with NRC regulations, a Radiation Safety Review was held on Tuesday August 24,1982 for all Quality Assurance Personnel who are involved with radiographic operations at the PDM Provo plant.

Signatures of those attending

mas Robinson

Mariano Orozco - ARSO

RADIATION SAFETY QUARTERLY AUDIT REPORT

AUDIT FINDING: THE RADIOGE	APHER	PERF	DRMANCE	REVIEW
FOR EACH RADIOGRAPITER I				
SHOULD BE DONE QUARTE	PLY)			
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7/1	romos	Volum	son sagia	ion supervise
ACTIONPPROVED BY:			DATE:	
COMMENTS:				

PAGE # 1 F

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Mariano Orozco	2/25/81	6/23/81	9/20/81	2/10/82	3/18/82	E)
Phil Bowers *	6/26/81	9/20/81	12/29/81)# 3
Rick Braze	6/23/81	1/6/82				DA9
Bill Peterson ★	6/26/81					
Kim Despain	8/18/81					
Tom Robinson	7/21/82					
Craig Child	HE IS WORKING IN THE FIELD		-ot 28/1/8	1		
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Palata SAFETY OFFICER

PITTSBURGH-DES MOINES CORPORATION FORM NO. RR1

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RADIATION SAFETY

QUATERLY AUDIT SCHEDULE

Date Performed	Date Due
16-17 JULY, 1981	16 OCT 1981
22-23 Oct, 1981	22 JAN 1982
	22 APRIL 1982
	22 JULY 1982
10-11 AUG 1982	10 NOV 1982
	PAGE # 1

OCCUPATIONAL EXTERNAL RADIATION EXPOSURE HISTORY

See Instructions on the Back

		FICATION	2. SOCIAL SECUR	ITV NO
HILL, SCOTT E.	NIDDLE)			
EDWIN SCOTT Z	rum ,		528-72	-6414
HILL, SCOTT E.	8/13/82			
3 DATE OF BIRTH (MONTH, DAY, YEA	(4)		4. AGE IN FULL	YEARS (N)
MARCH 20, 1955	the second secon		27	
	OCCUPATIONAL EXPO	SURE - PREVIOUS HISTORY		
5 PREVIOUS EMPLOYMENTS INVOLVING RADIATION EXPOSURE—LIST NAME AND ADDRESS OF EMPLOYER	6. DATES OF EMPLOYMENT (FROM-TO)	7. PERIODS OF EXPOSURE	8. WHOLE BODY (REM)	9. RECORD OR CALCULAT (INSERT ONE)
NONE -				-
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13 CALCULATIONS - PERMISSIBLE DE WHOLE BOOY:	OSE	LISTED IN COLUMN	45 5. 6. AND 7 15 CO	RE EXPOSURE HISTORY ORRECT AND COMPLETE
(A) PERMISSIBLE ACCUMULATED DOSE = 5(N-18)	REF	TO THE BEST OF M	state	8/13/82
(B) TOTAL EXPOSURE TO DATE (FROM ITEM 11)	REI	PHSSand De	TURE .	Corpora fun
		1 16 NAME OF LICENS	SEE	
PERMISSIBLE ACCUMULATED	REI			

OCCUPATIONAL EXTERNAL RADIATION EXPOSURE HISTORY

See Instructions on the Back

IDENTIFICATION

I. NAME (PRINT - LAST, FIRST, AND A	AIDDLE)		2. SOCIAL SECURI	1 T NO.	
WINDER , HARMON	529-48-2286				
DATE OF BIRTH (MONTH, DAY, YEA	3/30/82		4. AGE IN FULL YEARS (N)		
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Q. REMARKS	11. ACCUMULATE - TOTAL	D OCCUPATIONAL DOSE	none		
poul					

12. CERTIFICATION: I CERTIFY THAT THE EXPOSURE HISTORY
WHOLE BODY:

(A) PERMISSIBLE ACCUMULATED
DOSE = 5(N-18)

(B) TOTAL EXPOSURE TO DATE
(FROM ITEM 11)

(C) UNUSED PART OF
PERMISSIBLE ACCUMULATED
DOSE (A-B)

12. CERTIFICATION: I CERTIFY THAT THE EXPOSURE HISTORY
LISTED IN COLUMNS 5, 6, AND 7 IS CORRECT AND COMPLETE
TO THE BEST OF MY KNOWLEGGE AND BELIEF.

PRIMISSIBLE ACCUMULATED

12. CERTIFICATION: I CERTIFY THAT THE EXPOSURE HISTORY
LISTED IN COLUMNS 5, 6, AND 7 IS CORRECT AND COMPLETE
TO THE BEST OF MY KNOWLEGGE AND BELIEF.

PRIMISSIBLE ACCUMULATED

DATE

14. NAME OF LICENSEE

OCCUPATIONAL EXTERNAL RADIATION EXPOSURE HISTORY

See Instructions on the Back

	IDENTI	FICATION			
1. NAME PRINT - LAST, FIRST, AND N	2. SOCIAL SECUR	11Y NO. 46-6037			
3. DATE OF BIRTH MONTH DAY, YEA			4. AGE IN FULL YEARS (N)		
	OCCUPATIONAL EXPO	SURE - PREVIOUS HISTORY			
5. PREVIOUS EMPLOYMENTS INVOLVING RADIATION EXPOSURE—LIST NAME AND ADDRESS OF EMPLOYER	6. DATES OF EMPLOYMENT (FROM-TO)	7. PERIODS OF EXPESURE	8. WHOLE BODY (REM)	9. RECORD OR CALCULATE (INSERT ONE)	
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10. REMARKS	11. ACCUMULATE - TOTAL	D OCCUPATIONAL DOSE	0		

13 CALCULATIONS - PERMISSIBLE DOS WHOLE BODY:	E	12. CERTIFICATION: I CERTIFY THAT THE LISTED IN COLUMNS 5.6, AND 71S CO TO THE BEST OF MY KNOWLEDGE AN	RRECT AND COMPLETE
(A) PERMISSIBLE ACCUMULATED DOSE = 5(N-18)	REM	Dege Luka	8-16-1987
(B) TOTAL EXPOSURE TO DATE	*REM	EMPLOYEE'S SIGNATURE	
IC) UNUSED PART OF PERMISSIBLE ACCUMULATED DOSE (A-B)	REM	14. NAME OF LICENSEE	



Pittsburgh-Des Moines Corporation

580 East 600 South (P.O. Box 1447) Provo, UT 84601 801-373-8150

AUG 24, 1982

Subject: Safety Review (10 CFR 20.102 (a))

To comply with NRC ('O CFR 20.102 (a)) a safety review was held to talk about our responsabilities in obtaining a sign statement from the people we hire attesting to prior occupational dose.

Signature of those attending

Mariano Orozco - ARSO

PAGE # 2D



Research and Special Programs Administration

Model No.

IAEA CERTIFICATE OF COMPETENT AUTHORITY

Special Form Radioactive Material Encapsulation

Certificate Number USA/0166/S (Revision 3)

This certifies that the encapsulated sources, as described, when loaded with the authorized radioactive contents, have been demonstrated to meet the regulatory requirements for special form radioactive material as prescribed in IAFA 1/ and USA 2/ Regulations for the transport of radioactive materials.

I. Source Description - The sources described by this certificate are identified as the following Gamma Industries models which are constructed according to the listed drawing numbers:

Model No.	Drawing No.
VD and VD(HP)	602-7001-004
NB, NBG and NB(HP)	602-7001-005
Single Encapsulation Universal	
Source	602-7001-006
Double Encapsulation Universal	
Source	602-7001-007
Single Encapsulation Side Weld	602-7001-008

All models are welded encapsulations constructed of 300 series of ARMCO Type 17-4PH stainless steel.

II. Radioactive Contents - The authorized radioactive contents of these sources consist of not more than:

VD and VD(HP)	300 curies of	300 curies of:	
	Barium-131 Cadmium-109 Calcium-45 Calcium-47 Cesium-137 Chlorine-36 Chromium-51 Iridium-192 Cobalt-60 Iron-59	Manganese-54 Phosphorus-32 Rubidium-86 Selenium-75 Strontium-85 Thallium-204 Thulium-170 Tin-113 Ytterbium-169 Zinc-65	

Contents

PAGE # 3a A

II. Radioactive Contents (continued)

Model No. (con'd)

Contents (cont'd)

NB, NBG and NB(HP)

25 Curies Americium-241
30 millicuires Ra-226
500 millicuries Americum-241 and

Cesium-137 mixture

Single Encapsulation Universal Source

500 curies Iridium-192 20 curies Cobalt-60

Double Encapsulation Universal Source

5000 curies Iridium-192 2000 curies Cobalt-60

Single Encapsulation Side Weld

500 curies Iridium-192 20 curies Cobalt-60

III. This certificate, unless renewed, expires July 30, 1987.

This certificate is issued in accordance with paragraph 803 of the IAEA Regulations and in response to the June 7, 1982 petition by Gamma Industries, Baton Rouge, Louisiana, and in consideration of the associated information therein.

Certified by:

R. R. RAWL

Chief, Radioactive Materials Branch Office of Hazardous Materials Regulations Materials Transportation Bureau (DATE)

1/ "Safety Series No. 6, Regulations for the Safe Transport of Radioactive Materials, 1973 Revised Edition," published by the International Atomic Energy Agency (IAFA), Vienna, Austria.

2/ Title 49, Code of Federal Regulations, Part 170-178, USA

Revision 0 issued in response to the September 7, 1979, petition by Gamma Industries, Baton Rouge, Louisiana.

Revision 1 issued to add Cesium-137 to Models VD and VD(HP) Revision 2 issued to list alternate stainless steel type.

Revision 3 issued to extend expiration date.



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SEP 21 1981

Pittsburgh-Des Moines Corporation ATTN: Mr. C. D. Robertson 580 E. 600 South P.O. Box 1447 Providence, UT 84601

Gentlemen:

As requested in your letter dated July 1, 1981, we have registered you in accordance with the provisions of Paragraph 71.12(b) of 10 CFR Part 71 as a user of the following:

Mode1

Package Identification Number

6717-B

USA/6717/B

Sincerely,

Charles E. MacDonald, Chief Transportation Certification Branch

Division of Fuel Cycle and Material Safety, NMSS

cc: Gamma Industries

ATTN: Mr. Harry D. Richardson

P.O. Box 2543

Baton Rouge, LA 70821

SEP 23 100 M

PAGE # 36 A

8110080513



Pittsburgh-Des Moines Corporation

580 East 600 South (P.O. Box 1447) Provo, UT 84601 801-373-8150

Aug 24, 1982

Subject: Review of Paragraph 71.12(b) of 10CFR Part 71

To comply with Paragraph 49 CFR 173.393a(a)(1) a training session was held to remind us of our responsabilities to register with the USNRC.

Signature of those attending

Mariano Orozco - ARSO

PAGE # 36B



G A M M A INDUSTRIES

A Division of Nuclear Systems, Inc.
BATON ROUGE HOUSTON

P. O. BOX 2543
2255 TED DUNHAM AVENUE
BATON POUGE, LOUISIANA 70821
TELEPHONE 504/342-7791

P. O. BOX 34526 HOUSTON, TEXAS 77034 TELEPHONE 713/944-7676

CERTIFICATE OF COMPLIANCE

TO:	Pittsburgh-Des Moines Steel Co
	P. O. Box 1447
	Provo Utah, 84601

REFERENCE: USA DOT 7A TYPE A

Gamma Century S, SA Gamma 35, S, SA C-10

This is to certify that the referenced device has been tested and complies with all requirements of DOT regulations pertaining to this device when used in accordance with DOT regulations. Documentation of all tests are on file at Gamma Industries, Baton Rouge, Louisiana.

Don Riddle
Quality Assurance Manager

PAGE # 3 A

Form NRC-618 (12-73) 10 CFR 71

U.S. NUCLEAR REGULATORY COMMISSION CERTIFICATE OF COMPLIANCE

For Radioactive Materials Packages

1.(a) Certificate Number 6717	1.(b) Revision No.	1.(c) Package Identification No. USA/6717/B	1.(d) Pages No. 1.(e) Total No. Pages 2

2. PREAMBLE

- 2.(a) This certificate is issued to satisfy Sections 173.393a, 173.394, 173.395, and 173.396 of the Department of Transportation Hazardous Materials Regulations (49 CFR 170-189 and 14 CFR 103) and Sections 146-19-10a and 146-19-100 of the Department of Transportation Dangerous Cargoes Regulations (46 CFR 146-149), as amended.
- 2.(b) The packaging and contents described in item 5 below, meets the safety standards set forth in Subpart C of Title 10, Code of Federal Regulations, Part 71, "Packaging of Radioactive Materials for Transport and Transportation of Radioactive Material Under Certain Conditions."
- 2.(c) This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.
- 3. This certificate is issued on the basis of a safety analysis report of the package design or application-

3.(a) Prepared by (Name and address):

3.(b) Title and identification of report or application:

Gamma Industries P.O. Box 2543 Baton Rouge, LA 76821 Nuclear Packaging, Inc. application dated June 20, 1975, as supplemented

3.(c) Docket No. 71-6717

4. CONDITIONS

This certificate is conditional upon the fulfilling of the requirements of Subpart D of 10 CFR 71, as applicable, and the inditions specified in item 5 below.

- 5. Description of Packaging and Authorized Contents, Model Number, Fissile Class, Other Conditions, and References:
 - (a) Packaging
 - (1) Model No.: 6717-B
 - (2) Description

Radiographic device within a protective overpack. The overpack consists of an outer container which is a 10-gallon open head steel drum having a minimum 20-gauge body and cover, welded seams and a clamp-ring type head closure. The void space between the inner and outer container is filled with 1-1/2" thick molded asbestos free liner on sides, top and bottom, plus molded polyurethane filler to position and secure the radiographic device within the drum. Maximum gross weight of the package not to exceed 75 pounds.

(3) Drawing

The packaging is constructed in accordance with Nuclear Packaging Inc. Drawing No. SK-D-1, Rev. 2.

PAGE# 3 B

8008 180012

- 5. (b) Contents
 - (1) Type and form of material

Iridium-192 as sealed sources which meet the requirements of special form as defined in 10 CFR §71.4(o).

(2) Maximum quantity of material per package

200 curies.

- 6. The contents must be secured in a single snug-fitting inner radiographic device which has a metal outer wall and meets the requirements of 49 CFR §178.350 (DOT Specification 7A).
- 7. The source shall be secured in the shielded position of the radiographic device by the shipping plug, source assembly, and locking device. The shipping plug and source assembly used must be fabricated of materials capable of resisting a 1475°F fire environment for one-half hour and maintaining their positioning function. The ball stop of the source assembly must engage the locking device. The flexible cable of the source assembly and shipping plug must be of sufficient length and diameter to provide positive positioning of the source in the shielded position.
- 8. The packaging authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR §71.12(b).
- 9. Expiration date: July 31, 1985.

REFERENCES

Nuclear Packaging, Inc. application dated June 20, 1975.

Supplements dated: August 8, 1975; and February 26, 1980.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Charles E. MacDonald, Chief

Transporation Certification Branch

Division of Fuel Cycle and

Material Safety

Date: AUG 0 4 1980

PAGE# 3CC



UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

JUN 2 5 1981

Pittsburgh-Des Moines Corp. ATTN: Mr. C. D. Robertson Radiation Safety Officer 580 East 600 South Street Provo, UT 84601

Gentlemen:

Enclosed is Quality Assurance Program Approval for radioactive material packages No. 0452, Revision No. 0.

Please note the conditions included in the approval.

Sincerely,

Charles E. MacDonald, Chief Transportation Certification Branch Division of Fuel Cycle and

Division of Fuel Cycle and Material Safety, NMSS

Charle Shear Da

Enclosure: As stated

JUNE 1 P. W.D.Q.A.

PAGE # 4A

8107130076

NAC FORM 311 112-38

U.S. NUCLEAR REGULATORY COMMISSION

1. APPROVAL NUMBER 0452

REVISION NUMBER

QUALITY ASSURANCE PROGRAM APPROVAL FOR RADIOACTIVE MATERIAL PACKAGES

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 71, and in reliance on statements and representations heretofore made in Item 5 by the person named in Item 2, the Quality Assurance Program identified in Item 5 is hereby approved. This approval is issued to satisfy the requirements of Section 71.51 of 10 CFR Part 71. This approval is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Pittsburgh-Des Moines Corp.			3. EXPIRATION DATE	
STREET ADDRESS			July 31, 1986	
580 East 600 South Street			4. DOCKET NUMBER	
Provo	STATE	ZIP CODE 84601	71-0452	
S QUALITY ASSURANCE PROGRAM APPLICATION D	ATE(S)			

May 12, 1981

8107130077

- 6. CONDITIONS
 - A. The shipping activities authorized by this approval are procurement, maintenance, repair, and use of packages for licensed material in special form. All other shipping activities (i.e., design, fabrication, assembly, testing, and modification) shall be satisfied by obtaining certifications from package suppliers that these activities were conducted in accordance with an NRC-approved QA program. It shall remain the responsibility of the licensee-user that all transportation activities meet the requirements of 10 CFR \$71.51.
 - B. Activities conducted under applicable criteria of Appendix E of 10 CFR Part 71 to be executed with regard to transportation packages by July 31, 1981.

PAGE #4B

FOR MILUS. NICLEAR REGULATORY COMMISSION

Division of Fuel Cycle and Material Safety, NMSS

JUN 2 5 1981