

M.M.P. Quality Inspections, Inc.

May 3, 1994

United States Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D.C. 20555

Attention: Mr. Robert Baer, Chief, SCD Branch, USNRC

Subject: Reply to a Notice of Nonconformance (corrective action response to NRC Inspection Report Number 94202, docket no. 07100688)

Dear Mr. Baer,

I am writing to respond to the request for corrective actions cited in the abovementioned report. I feel that with your recommendations and the corrective actions we have implemented as a result of your audit the overall safety of our Gamma Radiography Program will be enhanced. Please accept the following as corrective action with implementation dates for the items listed as α through E. on NRC Inspection Report Number 94202.

Item A. " Quality assurance program. "

1. I have revised our radiation safety refresher training computer file to automatically highlight any personnel who have not updated their RT Safety refresher training so that they may be withheld from the Operations Schedule (for radiography work) until they can update by completing this training. Our normal practice will be to update every qualified individual in a timely manner (+ or - 5 working days). A photocopy of the revised computer log is attached as exhibit A. Effective June 1, 1994.

Item B. " Instructions, procedures, and drawings. "

 The annual visual acuity test will also appear on the revised computer log shown in item A., above. Expirations dates within one month will be automatically highlighted as well. Effective June 1, 1994.

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- 2. (See item 10. from corrective action letter dated Feb 22 1994). We have revised our Operating and Emergency Procedure MMP-RT-OEP-003 to require the source storage area survey once per year, and with the addition of new devices to our inventory. The current requirement of once per quarter is deemed excessive. Effective immediately.
- 3. (See item 6. from corrective action letter dated Feb 22 1994). We have revised our Radiation Safety Training documentation cover sheet to add a place for the RSO to sign for verification of hours of field experience completed, along with the actual hours. Effective immediately.

Item C. " Document control. "

- 1. (See item 9. from corrective action letter dated Feb 22 1994). I have reviewed the requirements for completing our transport/survey document with all radiographers, including the need to sign the form at the bottom when complete. Effective June 1, 1994.
- 2. (See item 11. from corrective action letter dated Feb 22 1994). The revision block data is now included on all pages of all procedures to ensure the use of only the most current procedure revision. Effective date June 1, 1994.
- 3. (See item 11. from corrective action letter dated Feb 22 1994). The revision block data is now included on all pages of all procedures to ensure the use of only the most current procedure revision. Effective date June 1, 1994.

Item D. " Control of measuring and test equipment."

- 1. We do not require periodic calibration of dimensional inspection equipment because we use it for reference only, but will now require an each use check of accuracy. As we are not a machine shop or otherwise involved in any close tolerance dimensional inspections we feel this corrective action is adequate. Effective date June 1, 1994.
- 2. We have revised our source receipt inspection report form to require the recording of the survey meter serial number and calibration expiration date. Effective immediately.

Item E. " Audits "

1. I have reviewed the files to verify Mr. Martini, Sheffer, McCoy, Ward, and Madison's documentation is complete regarding the previous corrective action request issued by me on 12/6/93. Future personnel requested by Benicia Management to be added to our roster of qualified radiographer personnel will require photocopies of all documentation, including the "instructions to radiographer" record prior to their addition to our radioactive materials license. Effective June 1, 1994.

I am hopeful these responses will meet with your approval. I have included photocopies of the modified procedures and documents with this letter to verify the completion of the above noted corrective actions. please call me if you have a question.

sincerely,

M.M.P. Quality Inspections, Inc.

Maurice M. Pickard Chief Executive Officer

Alex A. Bagatry III
Radiation Safety Director

CC:R. Baer, USNRC

M. Pickard, MMPQL C.E.O.

J. Arvizu Gen. Manager, MMPQI. Benicia

J. Fling, Ops. Dtr. MMPQI, Signal Hill

CC: JF, PG, WM	, TC	BELLEVIA I			Revision Date:		5/3/94	
							33374	
Refresher Training St	atus and V	isual Acuity	Expiratio	n Dates				
				RT Refreshe	r Training	1994		
	status	astreftra	hours yr to die	Tst querter	quarter	quarter	quarter	s exam due
name	- 6	8	2	, in the second	2nd	ě,	#	eye
ASSISTANTS Bolton								
	asst	2/16/94	2	2	0	0	0	N/A
Cooper	asst	2/16/94	2	2	0	0	0	N/A
Garcia, Richard	asst	2/2/94	2	2	D.	0	0	N/A
Garcia, Robert	asst.	2/16/94	2	2	0	0	0	N/A
Guevara, Joey	asst.	2/4/94	2	2	0	0	0	Oct-94
Gonzalez, Justo	asst.	suspend	0	0	0	0	G	Oct-94
Hines, C.	asst	2/16/94	2	2	0	0	0	N/A
Hunt	asst	2/16/94	2	2	0	6	0	N/A
Lee, Gerald	asst	2/2/94	2	2	0	0	0	N/A
Platt	asst	2/17/94	2	2	0	0	0	N/A
Rodriguez, Juan	asst	2/4/94	2	2	0	0	0	Apr-9
Spellens	asst.	2/4/94	2	2	0	0	0	N/A
Turner	asst.	2/16/94	2	2	0	0	0	Apr-91
Woodman	asst,	suspend	0	0	0	0	0	Oct-94
RADIOGRAPHERS								
Adame, Joe	radiog.	2/18/94	2	2	0	0	0	Apr-9
Bingel	radiog.	2/4/94	2	2	0	0	0	Sep-94
DesBordes	radiog.	2/2/94	2	2	0	0	0	Oct-94
Hernandez	radiog.	2/22/94	2	2	0	0	0	Jun-94
Jimenez, M.	radiog.	2/16/94	2	2	0	0	0	May-9
Martinez	ASS RSO		2	2	0	O	Ö	Sep-94
Quintero	radiog.	2/2/94	2	2	0	0	0	Oct-94
Reeves	radiog.	2/16/94	2	2	0	0	C	Oct-9
Rodriguez, R.	radiog.	2/16/94	2	2	0	0	0	Dec-94
ASST CAND.								
Gonzalez, Juan	asst. cand.	2/4/94	2	2	0	0	0	N/A
Montgomery, T.	asst. cand.	new hire	0	0	0	0	0	N/A
Shelman, T.	asst. cand.	new hire	0	0	0	0	0	N/A
SUPERVISORS								
Bagarry	RSO	2/2/94	2	2	0	0	0	Jun-94
Cline	OPS MGR	2/2/94	2	2	0	0	0	Oct-94
Fling	OPS DTR	2/2/94	2	2	0	0	0	+
Guevara	OPS DIR	2/2/94	2	2	0	0	0	Apr-9

M.M.P. Quality

Inspections, Inc.

Benicia, CA: 707/745-8121 Bellingham, WA: 206/647-2574

Alex A. Bagarry III
ASNI Level III
Director Quality Control