

DEC 17 1990

In Reply Refer To:
Docket No. 30-28835/90-01
License No. 35-23193-01

Edwards Pipeline Testing, Inc.
ATTN: Jerry R. Beck
Radiation Safety Officer
1205 South Gillette
Tulsa, Oklahoma 74104

Gentlemen:

Thank you for your letter of October 24, 1990, in response to our letter and attached Notice of Violation both dated September 28, 1990. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. While we agree that the proposed revision in radiographer field audit procedures should improve your ability to meet this quarterly requirement, you are reminded that the procedures presently identified in the license must be observed until the license renewal application has been reviewed and approved by NRC.

We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained. Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Sincerely,

L. A. Yandell for

A. Bill Beach, Director
Division of Radiation Safety
and Safeguards

cc:
Oklahoma Radiation Control Program Director

bcc w/copy of licensee letter:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (MS 4503)
CLCain
WLFisher
LLKasner
NMSIS
MIS System
RIV Files (2)
RSTS Operator

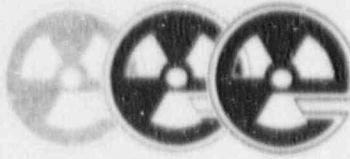
RIV:NMSIS *JK*
LLKasner
12/13/90

C:NMSIS *JK*
CLCain
12/14/90

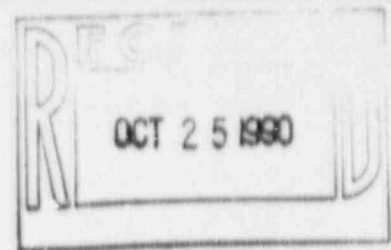
AD:DRSS
ABBeach *JK*
12/17/90

IE-07

9012210144 901217
REG4 LIC30
35-23193-01 PDR



EDWARDS
PIPELINE
TESTING, INC.



October 24, 1990

Mr. A. Bill Beach
United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

Re: License No. 35-23193-01
Docket No. 30-28835/90-01

Dear Mr. Beach:

This is in reference to your letter dated September 28, 1990 concerning the annual radiation safety inspection conducted August 29, 1990 by Ms. L.L. Kasner and Mr. R.A. Leonardi of your office.

As discussed with Ms. Kashner and Mr. Leonardi during the referenced inspection, we try very hard to conduct an efficient and stable program. We spend a considerable amount of time and resources on both our training and the maintenance of our equipment. We strive to comply with all of the regulations. However, we do realize we have had difficulty from time to time in performing our field inspections.

The primary reason for this, I'm sorry to say, is simply from an oversight on our part. The nature of our work makes it extremely difficult to always perform the inspections in a timely manner. Since our company strictly performs pipeline radiography we have a large number of radiographers working virtually coast to coast. This year we have worked eighty-nine radiographers in sixteen states from Michigan to Texas and from Colorado to New Jersey. As you can see, the majority of our work is several hundred miles away from our office. Mr. Edwards, Mr. Smith and myself endeavor to visit all of these locations and perform the inspections on a timely basis. Occasionally, we do miss someone. Unlike a company that works in a local area or sees their personnel on a daily basis, it is sometimes very difficult for us to achieve compliance in this area. As noted by Ms. Kasner, we have taken corrective actions and improvements have been made in this area, but we still have not reached the level of compliance that we prefer.

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APP

1205 South Gillette, Tulsa, Oklahoma 74104 918/582-1781

IG-90-309

LEON

You currently have in your possession, an application for the renewal of our license. In the application we have addressed the problem of field inspections. If you will note in Section I, Paragraph 7.0, we propose to select radiographers that have met certain criteria to be designated as Senior Radiographers and these "Senior Radiographers" be allowed to help perform required field inspections.

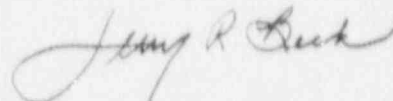
The Senior Radiographers must meet the following criteria before they can perform inspections: They must have at least five years experience as a radiographer using radioactive materials. He/she will receive two hours instruction in conducting the quarterly evaluations. The instructions will be given through simulated evaluations. Testing for qualification will be made by having the candidate perform an evaluation on the RSO. The candidate must be 100% proficient in all areas evaluated. Documentation of this process will be maintained on each individual successfully completing the process.

The Senior Radiographers will be present at the remote field locations on a daily basis. We feel that with this additional manpower it will be much easier to comply with the required field inspections.

I would like to thank Ms. Kasner and Mr. Leonardi for taking the time to discuss this matter at length and for their helpful recommendations. I feel with the implementation of these suggestions it will be much easier for us to be in compliance.

If there is any additional information you should want or need, please contact us and we will reply as soon as possible.

Sincerely,



Jerry R. Beck
Radiation Safety Officer

JRB/ml