

DEC 18 1990

In Reply Refer To:
License: 42-26900-01
Docket: 030-30175/90-04
EA: 90-213

Western Stress, Inc.
ATTN: Paul Abat, President
11011 Richmond Avenue, Suite 800
Houston, Texas 77042

Gentlemen:

This refers to the Enforcement Conference held at the request of the NRC in the Region IV office on December 7, 1990. This meeting related to activities authorized by NRC Byproduct Materials License No. 42-26900-01.

The subjects discussed during the meeting are described in the enclosed enforcement conference summary. As indicated in the summary, we will notify you subsequently of NRC's decisions on enforcement action.

In accordance with Section 2,790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the NRC's Public Document Room.

Should you have any questions concerning this matter, we will be pleased to discuss them with you.

Sincerely,
Original Signed By:
LAWRENCE A. YANDELL

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

Enclosure:
Enforcement Conference Summary
w/Attachment

cc w/enclosure:
Texas Radiation Control Program Director

bcc w/copy of licensee letter:
DMB - Original (IE-07)
ABBeach
MRodriguez, OC/LFDCB (MS 4503);
WLFisher
NMSIS
RIV Files (2)

RD Martin
LAYandell
CLCain
RABrown
MIS System
RSTS Operator

RIV:NMSIS *PAB*
RABrown:ch
12/13

for C:NMSIS *PAB*
CLCain
12/13

D:DRSS *for*
ABBeach
12/18 KID

9012280010 901218
REG4 LIC30 PDR
42-26900-01

IE-07
11

Enforcement Conference Summary

Licensee: Western Stress, Inc.

License: 42-26900-01

Docket: 030-30175

SUBJECT: ENFORCEMENT CONFERENCE TO DISCUSS NRC FINDINGS

On December 7, 1990, Mr. Fred Frongillo, Corporate Radiation Safety Officer for Western Stress, Inc., met with NRC staff members in the Region IV office, Arlington, Texas, to discuss the apparent violations identified during an inspection conducted by NRC's Region I office on October 5 and 6, 1990. The meeting included a review of those corrective actions proposed or taken by the licensee since the inspection.

The NRC presentation focused on the licensee's failure to survey a radiographic exposure device after each exposure and failure to wear personnel dosimetry. The apparent violations are of particular concern to NRC in that they resulted in radiation exposures to a licensee employee in excess of NRC limits. The employee's removal of personnel dosimetry during a radiography incident raised the possibility of inadequate training. The NRC also acknowledged the receipt of the licensee's letter dated October 18, 1990, indicating that the film badge worn by the radiographer during the incident showed a whole body exposure of 90 mrems.

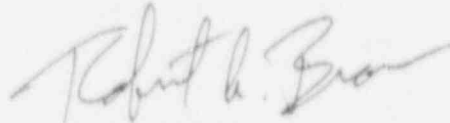
The licensee representative responded by admitting the violations and describing the actions that had been taken since the inspection. In particular, the licensee stated that the failure of the individual to survey the radiographic exposure device after each exposure and his removing personnel dosimetry indicated that fatigue may have contributed to the occurrence of these violations and company policy had been revised to limit work hours. In addition, the individual had been removed temporarily from radiography duties and had been banned from ever serving in a supervisory capacity. The licensee provided a detailed description of their training program, which appeared comprehensive. He also described the training given to the radiographer involved in this incident. Other corrective action described by the licensee included advising all other licensee personnel of the incident, doubling the number of management field inspections and district safety meetings, and increasing safety training from 16 hours per year to 32 hours per year. Also, they plan to replace their current exposure devices with ones of a different model. Additional information provided by the licensee included that as of the date of the enforcement conference the radiographer involved in the incident had not exhibited any physical symptoms of radiation exposure. Also, the scope of their operations under their NRC license consisted of two radiographers at their Pennsauken, New Jersey, office and five radiographers at the Richmond, Virginia, location.

NRC and the licensee discussed whether the source was secured in the exposure device after each exposure. The licensee stated that it was; in accordance with 10 CFR 34.22(a).

Western Stress, Inc.

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In conclusion, the Region IV enforcement officer explained NRC's enforcement policy to the licensee and stated that when a decision regarding enforcement action was reached, the licensee would be subsequently notified.



Robert A. Brown
Senior Radiation Specialist

Attachment:
Enforcement Conference Attendance List

ATTACHMENT

Enforcement Conference Attendance List

Western Stress, Inc.

Western Stress, Inc.

Fred Frongillo, Corporate Radiation Safety Officer

Nuclear Regulatory Commission

A. B. Beach, Director, Division of Radiation Safety and Safeguards
C. L. Cain, Chief, Nuclear Materials and Safeguards Inspection Section
G. F. Sanborn, Enforcement Officer
R. A. Brown, Senior Radiation Specialist

Telephonically:

M. LaMastra, Office of Nuclear Materials Safety and Safeguards
J. Johansen, Office of Enforcement
J. White, Region I
M. Roberts, Region I