

**KEOKUK STEEL CASTING**

DIVISION OF KAST METALS CORPORATION  
600 MORGAN STREET/KEOKUK, IOWA 52632  
TELEPHONE 319-524-2661

Docket 03004436



May 21, 1982

Nuclear Regulatory Commission, Region III  
Materials Radiation Protection  
Section I  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Attention: D. G. Wiedeman  
Acting Chief

Dear Sir:

In accordance with the provisions of 10 CFR 2.201, we are submitting this written statement of reply to the Notice of Violation dated April 28, 1982, which we received from your office.

Regarding Sited Violation No. 1

Over-View:

In a letter to the License Management Branch of the N.R.C. dated December 15, 1980, we requested that Mr. Mark Anderson be listed as a Radiographer's Assistant. Mr. D. R. Gibbons, who conducted the N.R.C.'s routine safety inspection of our records and facilities, had a copy of this letter in his possession. We are enclosing a copy at this time.

During a period extending from before December 18, 1980, when we sent in our Application for Byproduct Material License (please find copy of letter enclosed), until October 8, 1981, when we received a copy of Amendment 21 to License No. 14-07206-01 (please find a copy of this letter dated October 2, 1981, enclosed), we were involved in writing our new license. We have concluded that this may be the reason Mr. Anderson had not been entered on our license as a Radiographer's Assistant when, on August 12, 1981, almost eight (8) months after we requested that he be so entered, we sent in a letter stating that he had worked as a Radiographer's Assistant for over six months, and, requesting that he become a Radiographer on our license.

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When we then received our copy of Amendment 21 to our license on October 8, 1981, the accompanying letter stated, "since Mr. Anderson has never been listed as a Radiographer's Assistant on License No. 14-07206-01, he will be so listed for a period of three (3) months at which time you may choose to reclassify him as a Radiographer".

At this point Mr. Anderson began work (officially) as a Radiographer's Assistant and did so for three (3) months until January, 1982. At that point we began letting him work part of the time alone as a Radiographer. It was our intention to send in a request (again) for Mark to be reclassified on our license as a Radiographer.

Unfortunately we had not done so when Mr. Gibbons conducted his inspection on April 20, 1982.

1. Corrective Action Taken and Results Achieved

We will send in a request including form 313-R-S and the \$40.00 fee to the Radioisotopes License Branch of the N.R.C. so that Mr. Anderson will be reclassified as a Radiographer. We will pay close attention to see that we receive notice from the N.R.C. that the change has in fact been made.

2. Corrective Action Taken to Avoid Further Non-Compliance

In the future we will pay close attention to the N.R.C.'s correspondence to us, rather than basing our actions on our correspondence to them.

The Radiation Protection Officer will be taking a more active role in:

- a. Reviewing with the Radiation Technical Director any needed changes in our license regarding personnel.
- b. Insuring that these changes are officially documented in our license before being allowed in practice.

3. Date When Full Compliance will be Achieved

Before May 31, 1982, we will have sent out request to the N.R.C. for Mr. Anderson to be reclassified as a Radiographer. We will be in full compliance as soon thereafter as the N.R.C. acts upon our request.

Regarding Sited Violation No. 2

Over-View:

Our letter dated August 12, 1981, and addressed to the Materials Licensing Branch of the N.R.C., included among other things, a plan for a periodic training program to be initiated at that time. That program was developed upon the suggestion by Mr. Connie Presley, our Corporate Non-Destructive Testing Specialist who resides in Shreveport, Louisiana, that he could be available periodically to deliver a training session on some area of Radiation Safety or Radiography. At that time it was not unusual for him to visit the Keokuk Plant at intervals of approximately three (3) months. For this reason we wrote in our license that he would provide us with a periodic training session approximately every three (3) months. For economic reasons, however, many individuals in our company, Mr. Presley included, have had their traveling expense funds sharply reduced. He has been unable to visit the Keokuk Facility as he intended.

1. Corrective Action Taken and Results Achieved

We are revising Section 6.(F) Training Program, Part D Periodic Training, and submitting the revision along with the required fee to the N.R.C. (Radioisotopes License Branch). If approved Section 6.(F) Training Program, Part D Periodic Training will read as follows:

Approximately every three (3) months all Radiographer's Assistants and Radiographer's will receive "Periodic Training" by one (1) of the three (3) means here described.

- a. Mr. Connie Presley, our Corporate Non-Destructive Testing Specialist (SNT Level III in Radiography), will present a lecture on one or more areas of Radiation Safety and/or Radiography. An outline of his presentation will be kept on file.
- b. Mr. Connie Presley will send a letter concerning Radiation Safety and/or Radiography which each Radiographer's Assistant and Radiographer will read. A copy of this letter will be kept on file.
- c. Our Radiation Technical Director will present either orally or in writing, information concerning Radiation Safety and/or Radiography. A copy of the presentation will be kept on file.

2. Corrective Action Taken to Avoid Further Non-Compliance

Our Radiation Protection Officer will be responsible for maintaining a record showing when periodic training presentations are due to be given, the actual dates presentations are given, and containing copies of the presentations. This, along with the fact that once our license revision is approved, our in-house Radiation Technical Director will be qualified to present periodic training, should insure our ability to avoid further non-compliance.

3. Date When Full Compliance will be Achieved

Effective today, May 21, 1982, we will proceed on the assumption that the N.R.C. will approve our proposed revision of the Periodic Training Section of our license, and commit ourselves to having received Periodic Training as prescribed in that proposed change before August 21, 1982.

Our proposed revision will be sent in to the Radioisotopes License Branch of the N.R.C. by May 31, 1982.

Sincerely,

KEOKUK STEEL CASTING  
Division of Kast Metals Corp.

*Floyd Henson* <sub>VSN</sub>

Floyd Henson  
Radiation Technical Director

*Lowell Long*

Lowell Long  
Radiation Protection Officer

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Enclosures