



# X-R-I TESTING, INC.

SUBSIDIARY OF X-RAY INDUSTRIES, INC.

October 26, 1982

United States Nuclear  
Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Attention: D. J. Sreniawski, Chief  
Materials Radiation Protection  
Section 2

Subject: License No. 21-05472-01

Gentlemen:

We are responding to your letter to us dated October 7, 1982 regarding violations in noncompliance of our NRC License No. 21-05472-01.

Both violations had the same underlying cause; i.e., misunderstanding on the part of administrative personnel that the 90 microcurie cesium-137 calibrator source was exempt from licensing. With the objective of better control over dosimeter effectiveness, it was decided to perform the annual check of dosimeters for correct response to radiation within our facility. During conversations with personnel of Victoreen, the supplier of the desired dosimeter calibrator, the impression was conveyed that due to the small amount of radioactive material involved, the calibrator was exempt from licensing provisions.

This failure in verbal communications led to instructions from administrative personnel to the Radiographers responsible for the physical inventory, that it was not necessary to include this source in the inventory and, further, that it was therefore not required to leak test the source. In this case, our administrative procedure was violated in that the RSO was unaware that the source had been actually procured, again because of the basic erroneous assumption that the source was exempt.

With respect to both violations, the corrective action taken included written reinstruction to administrative personnel that procurement of any radioactive source, regardless of activity, be acknowledged by the RSO or Assistant RSO's. Since all such procurements are channeled through only one administrative officer of X-R-I Testing of Michigan, Inc., it is most improbable that this type of violation can occur in the future. Subsequent to the

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NRC safety inspection of September 16 and 17, the source in question has been included in our inventory and leak tested in accordance with 10 CFR 34.25 and 34.26. Since we routinely maintain a monthly physical inventory, instead of the quarterly inventory required by 10 CFR 34.26, compliance with violation 1. has been reflected in our September, 1982 inventory. The required leak test was also conducted on October 13, 1982 with acceptable results.

We trust these facts will satisfy the requirement to respond to the Notice of Violation dated October 6, 1982. We further appreciate the diligence of the NRC inspectors in bringing this matter to our attention.

Please direct all correspondence concerning this matter to Robert T. Anderson at our Detroit facility.

Very truly yours,

Robert T. Anderson  
Technical Director  
and Ass't. RSO

Richard W. Thams  
President

Leonard H. Schlipp  
Radiation Safety Officer

RTA:cjw