

BRIGGS



200 Hingham Street, P. O. Box 369, Rockland, MA 02370-0369 ▶ (617) 871-6040

United States Nuclear Regulatory Agency
Region I
475 Allendale Road
King of Prussia, PA 19406

November 16, 1990

Re: Response to Notice of Violation, Docket No. 030-10963, License No. 20-16401-01
EA 89-221, October 22, 1990

Gentlemen :

In order to assure that our activities are conducted in accordance with our license, a number of changes have been made since the time of the January 21, 1988 inspection performed by the NRC. A re-organization of the company has been performed, this included Kevin Curran being replaced as the NDE manager (he has since left our employment), the Non- Destructive Examination Dept. has been combined with the New Building Construction Dept. which places the overall management of the department with Mr. Joel Chase, which enables Mr. Paul Skorohod to better function as our Radiation Safety Officer (RSO).

We have also instituted more stringent requirements with respect to Quality Assurance (Q.A.). The monthly Q.A. Audits are performed directly by Paul Skorohod, not by one of his subordinates. Reports with respect to the Radiographic Field Audits and the Monthly Q.A. checklist are submitted to me quarterly rather than yearly and the results are reviewed with Joel Chase, Paul Skorohod and with Ray Lareandean the New Building Construction Dept. Manager. Any noted deficiencies will be immediately corrected, changes will be made to assure that violations do not re-occur and notification of the violation with appropriate changes will be forwarded to the NRC. A memo has been issued to all employees stressing the need for self-identification of violations and the established procedures by which employees can notify both the RSO and myself.

We concur that it is extremely important that accurate and complete records and information be submitted to the NRC. The responsibility for the daily collection of all required radiation records (Utilization Records, Bill of Ladings, etc.) and the collection and dispersment of film badges has been placed with Winifred Welch. These records are submitted to the RSO daily for review.

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All correspondence with the Nuclear Regulatory Agency (NRC) will be reviewed first by the department manager, then by the RSO and finally by the President of the Company.

In order to assure ourselves that all personnel involved with licensed activities understands our license requirements and their responsibilities to the NRC, a letter has been submitted to each of them which outlines these responsibilities and requirements. All personnel are required to return this document, their signature indicating that they understand their responsibilities to the NRC and understand the company's license requirements.

To re-affirm the importance we place on complying with all regulations and procedures and to make sure that every employee is committed to following these regulations, a formal disciplinary policy has been established. The disciplinary action that could be taken ranges from a written reprimand placed in the employees personnel file which would effect future reviews, days off without pay and finally dismissal. This policy applies to all levels of employment.

Since January, 1988 the NRC has inspected us three times; one by R.H. Ludun on December 14, 1988, the second by David J. Callus on August 9, 1989 and the third by Eric H. Reber on May 31, 1990. It appears that many of the changes we have initiated are positive ones since all of these inspections revealed no violations.

In closing, I wish to state that we fully intend to provide you with complete and accurate information at all times and have to best of our ability tried to instill this attitude in each and every employee, from management down to the technicians.

The response to the Notice of Violation is attached. If there are any questions please feel free to contact me at my office.

Sincerely yours,



David S. Campbell
President

The following are the responses for the violations of the NRC regulation, as identified during your inspection conducted on January 21 and 22, 1988.

Violation A We agree that the violation as stated did occur. When the radiographer, who is no longer with Briggs Associates, was asked why he did not properly survey the exposure device his response was that he was nervous due to the presence of the NRC inspectors and that when he placed the survey meter against the side of the projector the mr/hr reading obtained was the same as it was prior to the exposure.

In order to assure that the correct procedures are utilized, all of our radiographers and radiographic assistants were retrained with regard to the procedures used to survey the exposure device. In addition, the procedure as stated in our Operating and Emergency Procedure was highlighted.

Since the date of the inspection we have performed 15 Radiographic Field Audits and in all cases the proper procedures in performing this and all surveys have been utilized by our technicians. We are in full compliance as of this date.

Violation B We agree that the violation did occur. The reason the cell was not posted with a " Caution - High Radiation " sign was due to a misinterpretation of the regulations. The sign was not posted since the high radiation area was inside the cell, this area is inaccessible, the sign is not visible when the interior of the cell is a high radiation area, and the cell is under continuous surveillance when in use.

Upon notification of this violation the " Caution - High Radiation " sign was immediately attached to the inside of the cell. To avoid future violations, during the required monthly checks of the cell alarm system, the posting of all required signs is also checked.

We have been in full compliance since January, 1988.

Violation C We agree that our shipping papers did not contain all of the required information. There are two reasons for this, first of all we did not fully understand the Dept. of Transportation's Regulations and during previous inspections these papers were reviewed and no mention was ever made as to their incompleteness.

The Bill of Lading form has been revised to include all of the information required by 49 CFR 172.202 and 172.203. These new forms have been used since August, 1989 and all of our personnel have been instructed in how to properly complete them.

The Radiographic Audits performed since November, 1989 have shown that the Bill of Lading Reports have been properly completed. We have been in full compliance since August, 1989.

Violation D We agree with the violation. We did not retain the Utilization Record because the activity was performed for the sole purpose of a safety audit and the exposure device did not leave the cell.

In order to avoid any future violations we have revised our Radiographic Field Audit Report to include a statement that if an exposure device is assigned to any of our personnel for the purpose of performing a safety audit then a copy of the utilization form will be attached to the audit report.

Since the time of the inspection all audited activities have been performed during scheduled radiographic inspections and required Utilization Reports have been completed and maintained. We have been in compliance since February, 1988.

Violation E We agree that the violation did occur. According to our records the individual in question performed radiography as a trainee on during the month of December, 1987. He abruptly left our employment in January, 1988 giving us no notice or forwarding address. He did not turn in the film badge which was assigned to him nor did he record his daily dosimeter readings on the required form, because of this we did not have his exposure history when the inspection occurred on January 21, 1988.

To correct the situation we have estimated his exposure based on the exposures of the radiographer and the radiographic assistant who were training this individual on the days for which no exposure history is available.

In order to assure that this situation does not happen again, all personnel have been instructed to submit their radiation exposures daily. In addition, more stringent controls over the issuance, retrieval and shipment of all film badges have been instituted to assure that radiation history for all personnel are complete and accurate.

A review of the film badge and dosimeter logs which is performed monthly has revealed that all records of exposure are complete and that we have been in compliance since February, 1988.

Violation F

We agree that 10 CFR Parts 19 and 20 nor a document describing their location was not posted on January 22, 1988. At the time of the inspection we were in the process of relocating the Non-Destructive Testing Department (Radiography) to a different area of the building and all of the material including the above which had been previously posted had been removed and had not been reposted.

In order to assure that we have no future violations with respect to this regulation we have posted the required materials in three separate locations within the building. As of this date we are in full compliance with the requirements of 10 CFR 19.11(a) (1) and (b).