

October 4, 1982

OCT 13 1982

UNITED STATES NUCLEAR REGULATORY COMMISSION
Region IV
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76012

ATTN: Mr. John T. Collins

Dear Mr. Collins:

As a result of the inspection conducted on June 29-30, 1982, we are responding to the Notice of Violation; Docket # 30-11450, License # 49-16670-01.

Item # 1a Possession of four unauthorized Gamma Industries Model A-1-A sealed sources.

Corrective Action 1) Sources taken out of productions on July 3 and 4, 1982. Source #135.042 shipped to Gamma Industries on July 6, 1982, source # 136.042 shipped to Gamma Industries on July 6, 1982, source # 134.042 shipped to Gamma Industries on July 6, 1982, source # 137.042 shipped to Gamma Industries on July 21, 1982.

Corrective Action 2) We have amended our license to authorize us to possess Gamma Industries A-1-A sealed sources.

Corrective Action 3) Full compliance on July 7, 1982.

Item # 1b Possessed a Gulf Nuclear Model RGSA-13 sealed source in a Gulf Nuclear Model 20V exposure device.

Corrective Action 1) Source removed from exposure device on September 16, 1981.

Corrective Action 2) We stopped purchasing Model RGSA-13 sealed source.

Corrective Action 3) Full compliance as of January 14, 1982.

Item # 1c Possessed a Gulf Nuclear Model RGSA-13 sealed source in a Source Production and Equipment Model 2-T.

Corrective Action 1) Source removed from exposure device on October 9, 1981.

Corrective Action 2) We stopped purchasing Model RGSA-13 sealed sources.

Corrective Action 3) Full compliance as of January 14, 1982.

Item # 1d Possessed a Gulf Nuclear Model RG-13 sealed source in a Source Production and Equipment Model 2-T exposure device.

Corrective Action 1) Source removed from exposure device and places into storage.

8211230059 821115
NMS LIC30
40-16670-01 PDR

con't. on page two

inspection services, inc.

casper, wyoming

October 4, 1982

Page two

Corrective Action 2) We have amended our license to authorize us to possess a Gulf Nuclear Model RG-13 in a Source Production and Equipment Model 2-T exposure device.

Corrective Action 3) Full compliance as of July 7, 1982.

Item # 2a Item 6.8.1 of the Radiation Safety Manual states that all exposure devices and sources will be stored in designated locked facilities.

Corrective Action 1) As of July 1, 1982 the storage container has had a lock purchased and installed.

Corrective Action 2) Two sets of keys have been issued for the storage container, one set to the desk of Jana Moore, the Corporate Controller. The second set to Wayne Nelson. It is Wayne Nelson's responsibility to issue and to receive sources from our radiographers and to lock and unlock the storage vault.

Corrective Action 3) Full compliance was achieved July 1, 1982.

Item # 2b Attachment E, Part C(A) of the Radiation Safety Manual states that periodic re-training will be conducted at least every 12 months.

Corrective Action 1) We are in the process of retraining all radiation handling employees that have been in employment for 12 months or longer.

Corrective Action 2) Implementation of an internal audit system similar to that used for recalibration of our survey meters. The system will be based on a rolo-dex file.

Corrective Action 3) Full compliance December 31, 1982.

Item # 3a Transporting hazardous materials on Wyoming highways during the period, March 26, 1981 to June 30, 1982.

Corrective Action 1) All sources leaving our shop are now assigned a shipping certificate.

Corrective Action 2) We are in the process of printing a shipping certificate that will contain more than one shipment. Thus our sources can go from job to job without having to first come back to the ship for a new shipper certificate. In this way I feel that we will be able to correct our problems.

Corrective Action 3) Full compliance on October 25, 1982.

Item # 3b An outside container enclosing a DOT specification Type B package of radioactive Material was not labeled in accordance with 49CFR 173.25 on June 30, 1982.

Corrective Action 1) Signs are being printed to read, "Inside Package Comply with Prescribed Specifications".

con't. on page three

October 4, 1982
Page three

Corrective Action 2) All trucks that carry radioactive materials will have the sign placed on the truck mounted storage container.

Corrective Action 3) Full compliance by October 31, 1982.

Item # 3c Missing certification for special form radioactive material transported on public highways during the period, March 26, 1982 to June 30, 1982.

Corrective Action 1) We have contacted all suppliers of radioactive material and have requisitioned the proper paper work.

Corrective Action 2) A file has been set up in our radiation files to hold this paper-work.

Corrective Action 3) Full compliance October 31, 1982.

Item # 3d Radioactive exposure device was not blocked or braced during transportation.

Corrective Action 1) We are in the process of fabricating new storage boxes for the exposure device.

Corrective Action 2) The new containers will store only the exposure device. Thus it will eliminate its ability to change position during conditions normally incident to transportation.

Corrective Action 3) Full compliance January 31, 1983.

Item # 4 A quality assurance program was not established for shipment of licensed materials during the period of March 26, 1981 to June 30, 1982.

Corrective Action 1) We are in the process of adopting a quality assurance program based on the guide lines proposed in a letter from the NRC on March 27, 1980.

Corrective Action 2) We will use a monthly audit that will correspond with our monthly radiation audit. A written check list will be used, the results of the audit will be maintained.

Corrective Action 3) Full compliance October 31, 1982.

Item # 5 Quarterly inventories conducted July 2, 1981, October 1, 1981, and January 7, 1982 did not provide the location of sealed sources.

Corrective Action 1) This procedure is normally implemented in our organization. I as RSO neglected the location.

Corrective Action 2) We have made up a check list that will be completed on a monthly basis to assure ourselves that all audit points have been covered.

Corrective Action 3) Full compliance October 31, 1982.

con't. on page four

October 4, 1982

Page four

Item # 6 Utilization logs for six radiographers did not provide a discription of radio-graphic exposure device.

Corrective Action 1) All radiographers have been informed of this violation and how to correct it.

Corrective Action 2) All persons receiving and filing utilization logs have been instructed on the correct content of the UT Logs. If the correct information is not present, the operations manager is informed. The operations manager will take the corrective measures.

Corrective Action 3) Full compliance August 31, 1982.

Item # 7 Pocket dosimeters used had not been checked for accuracy during the period of March 26, 1981 to June 30, 1982.

Corrective Action 1) We have submitted an amendment to our Radiation Safety Manual, Attachment C, Personnel Monitoring.

Corrective Action 2) We will have an in house calibration procedure, set up on a rolo-dex file that will be similar to our survey meter calibration file.

Corrective Action 3) Full compliance one month after receiving authorization from the NRC.

Sincerely,



CHRISTIAN R. OLSEN
Radiation Safety Officer

MID-CON INSPECTION SERVICES, INC.
P.O. BOX 274
Casper, WY 82602
307/234-0800

CRO/dkc

inspection services, inc.

casper, wyoming