

ABC Testing Inc.

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January 15, 1991

United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, PA. 19406

Attention: Mr. Malcolm R. Knapp, Director
Division of Radiation Safety and Safeguards

Subject: Docket No. 030-19233
Inspection No. 030-19223/90-001
NRC License: 20-19778-01

Dear Mr. Knapp:

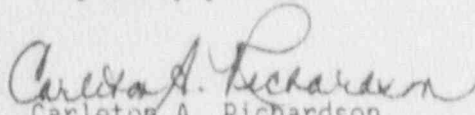
This letter is written to address Item 1 of your letter dated December 28, 1990.

Item 1: Regarding this violation, I do concur that 10 CFR 20.105 (b) (1) was violated. However, I would also like to point out that in ABC TESTING INC.'s Operating and Emergency Manual, Para. 11.6.2 this situation is addressed. This manual was accepted by your office.

It has been stated to me that the exposure in question was the most hazardous situation of the series of radiographs to be taken at Westbrook, Maine and that the source was of a relatively small activity which may have affected the judgement of the crew. I have instructed them to restrict the areas to a larger dimension than necessary in the future and then, move the lines if required to do so by production personnel in the area.

I still take issue with this audit performed on June 27 and 28, 1990. I feel I will continue to have a strained relationship with the two inspectors involved if and when they are sent to this facility in the future.

Very truly yours,


Carleton A. Richardson
President

JAN 25 1991

CAR/ckr

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