

ABC Testing Inc.

95 FIRST STREET • P.O. BOX 868 • BRIDGEWATER, MASSACHUSETTS 02324

TELEPHONE 508 - 697-6068 • FAX # 508 - 697-6154

October 31, 1990

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

Attention: Mr., John R. White, Chief
Nuclear Materials Safety Section C
Division of Radiation Safety and Safeguards

Subject: Docket No. 030-19223
NRC License: 20-19778-01
Severity Level IV and V

Dear Mr. White:

This letter is written to you to address what I feel is a debatable situation regarding Severity Level IV and Severity Level V violations. These were reported by Mr. Thomas K. Thompson and James P. Dwyer during an audit of ABC TESTING INC. on June 27 and 28, 1990.

Violation A. - This violation describes an exposure performed at S. D. Warren Company, Westbrook, Maine on Unit #3 at 12:59 to 13:03, 6th floor. The source was a 47 ci, Ir 192 capsule collimated. This was the initial exposure taken in a series of eight exposures. This is used to adjust the radiation boundaries of subsequent exposures as necessary.

Mr. Thompson and Mr. Dwyer had been observed on the fifth floor by Mr. Geoffrey Durant of ABC TESTING INC. while surveying the fifth floor area by the exposure. It had already been determined at that time that a sign was necessary at the entrance to that floor. As Mr. Thompson and Mr. Dwyer had already been identified as NRC Inspectors with survey meters, film badges and dosimeters, they were not questioned at this time.

This situation has been discussed with all radiographers and a larger area will be roped off initially where practical however, this sometimes results in walkways being roped off which leads people to enter the lines.

Violation B. - 10 CFR 34.3.3 Chargers and dosimeters are provided to all field crews. We have found that in our experience it is impractical to try to achieve an absolute zero on a dosimeter at all times. All radiographers have been instructed to recharge their dosimeters* on a daily basis when performing Radiography.

*as close to zero as possible

At this time I would like to advise you that in the twenty years that I have performed the duties of Radiation Safety Officer, I found this audit to be the most unprofessional I have ever undergone for the following reasons:

(a) Mr. Thompson entered my facility and questioned the secretarial force prior to meeting with me.

9102270115 910212
REG1 LIC30
20-19778-01 PDR

NOV 05 1990

A B C Testing Inc.

95 FIRST STREET • P.O. BOX 868 • BRIDGEWATER, MASSACHUSETTS 02324

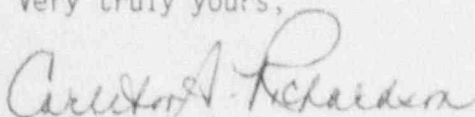
TELEPHONE 508 - 697-6068 • FAX # 508 - 697-6154

- (b) Mr. Thompson located our job board and questioned personnel as to what type of jobs were listed. He saw that we had a job in Westbrook, Me. for June 28, 1990. (at the time of his visit, this job had not even been confirmed) He apparently then decided that he would do a Field Audit without even questioning the type of job it was, whether it was a confirmed job or any particulars at all about it. It was very fortunate that he did not travel to Maine only to find out that it was Ultrasonics or some other phase of testing.
- (c) The conclusion of the inspection did not occur until July 18, 1990 over the telephone at my initiation.
- (d) Mr. Thompson and Mr. Dwyer caused delays at S. D. Warren in excess of one hour after the trades had already been notified that we would be performing radiography in the area from 12:00 to 12:30 on Unit #3. Because of this shutdown of the job, for this time period, people could have been wandering around the Boiler House.
- (e) Mr. Thompson stated at 13:22 that he was going on overtime at that point. He stated that he hoped the radiographers could safely finish the job. This remark was not necessary and I feel that if he had any doubts as to their ability to finish the job safely, he should have remained there or shut the job down completely.

I hope you will accept this letter in the vein of constructive criticism which is its intent. I feel that it is important that we all behave as professionally as possible in these situations and learn from each other.

If you have any questions or feel that any further discussion is necessary, please do not hesitate to contact me at any time.

Very truly yours,


Carleton A. Richardson
President *CR*

CAR/ckr