

FEB 18 1994

Docket No. 030-32883
License No. 42-25215-01
CAL No. 2-94-02

Technical Welding Laboratories, Inc.
ATTN: Mr. Norman P. Lanier
2815 Lilac
Pasadena, Texas 77503

Dear Mr. Lanier:

SUBJECT: CONFIRMATORY ACTION LETTER

This is in reference to our safety inspection of licensed activities conducted on February 14 and 15, 1994. The inspection included a review of your radiography operations. Our inspection revealed that several elements of your program appear to have been inadequately implemented during a period of increased work activity in mid-1993. Your records indicated several workers received doses in excess of NRC dose limits which, prior to January 1, 1994, were 1250 mrem per quarter for workers without a completed NRC Form 4. In addition, there were several examples of failures to perform required quarterly audits of radiographers and to control access to areas where individuals, who were not radiographers or radiographers' assistants, could receive two mrem in any one hour.

As a result of a telephone conversation between Mr. D. M. Collins of this office and Mr. Michael H. Ray of your St. Croix Office, on February 16, 1994, it is our understanding that you have taken or will take the following actions which will be completed by the dates specified:

1. Review the doses received during 1993 for those workers with doses recorded to be above 1250 mrem in a quarter to determine: (1) if there was NRC Form 4 or equivalent on file; and (2) for those individuals with missing TLD results, the correct total doses they received. Any doses in excess of 10 CFR 20.101 limits will be reported to the NRC in accordance with 10 CFR 20.405. These actions will be completed by March 18, 1994.
2. Review the circumstances surrounding the failure to perform the evaluations noted in paragraph 1 above at the time the doses were received; the circumstances surrounding the failure, in mid-1993, to perform audits of radiographer every three months as required by 10 CFR 34.11(d)(1); and circumstances surrounding the failure to restrict access, as required by 10 CFR 20.105, to areas where dose rates could result in an individual (not a radiographer or radiographer's assistant) receiving in excess of two mrem in any one hour. Based on this evaluation, you will determine the root cause of these problems and

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develop corrective actions to assure these problems do not recur. The results of this evaluation and your proposed corrective actions will be submitted to the NRC, Region II by March 18, 1994.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to:

1. Notify me immediately if your understanding differs from that set forth above;
2. Notify me if for any reason you cannot complete the actions as specified and advise me in writing of your modified schedule in advance of the change; and
3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an Order formalizing the above commitments or requiring other actions on your part, nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,



J. Philip Stohr, Director
Division of Radiation Safety
and Safeguards

cc: Hess Oil Virgin Island Co.
Technical Welding Laboratory
ATTN: Mr. Michael H. Ray
Project Manager - R.S.O
No. 1 Estate Hope Kingshill
St. Croix, U.S.V.I 00820

U. S. Virgin Islands

bcc: (See page 3)

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bcc: Document Control Desk
 S. Thompson, DEDS
 J. Lieberman, OE
 C. Paperiello, NMSS
 J. Glenn, NMSS
 B. Uryc, EICS
 D. M. Collins, DRSS
 C. Hosey, DRSS
 J. Potter, DRSS
 H. Bermudez, DRSS
 D. Heim, DRSS

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RII:DRSS	RII:EICS	RII:EICS	RII:ORA
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DMCollins	BMallett	BUryc	CEvans
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* See previous concurrence.

*Discussed with
 J. Glenn
 NMSS
 2/22/94
 [Signature]*

Mr. Elias Plácido

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