

FEB 9 1994

Docket No. 030-06695  
License No. 47-11883-01  
EA 93-205

Nondestructive Inspection  
Services, Inc.  
ATTN: Mr. H. M. Hauldren  
President  
Post Office Box 220  
Hurricane, WV 25526

Gentlemen:

SUBJECT: COMMENTS CONCERNING INSPECTORS' ACTIONS

This is in response to your comments in your letter dated September 22, 1993, concerning the inspection of your NRC licensed activities conducted on July 27, 1993.

We have reviewed your comments and are providing the enclosed response to your specific comments, which we trust will clarify the inspection activities you addressed.

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

Should you have any questions concerning this letter, please contact us.

Sincerely,  
ORIGINAL SIGNED BY  
J. PHILIP STOHR

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

Enclosure:  
Response to Licensee Comments

bcc w/encl:  
Document Control Desk  
J. Henson  
J. Mumper  
C. Hosey  
B. Uryc

RII:DRSS	RII:DRSS	RII:DRSS	NLO RII:RC
<i>CH</i> CHosey	<i>DC</i> DCollins	<i>BS</i> BMallett	<i>CE</i> CEvans
2/9/94	2/9/94	2/9/94	2/9/94

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PDR ADOCK 03006695  
C PDR

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## ENCLOSURE

### Response to Licensee Comments

#### Licensee Comments

Three gentlemen conducted the inspection but Mr. J. Mumper did the entire inspection--asking and answering all questions during the inspection. With three employees from the NRC office, the licensee was not sure the inspection was a routine inspection.

#### NRC Response

The inspection was a routine inspection conducted in accordance with our normal inspection procedure and at the normal frequency. Certain aspects of our program provide for accompaniment of our inspectors by more senior inspectors and their supervisor, as was the case with the inspection of Nondestructive Inspection Services, Inc. on July 27, 1993.

#### Licensee Comments

On two different occasions, during the inspection, Mr. Mumper asked the radiographers if their dosimeters had been zeroed after each exposure. Questions of this manner from a representative of the NRC can lead to mistakes being made when they are made in a suggestive manner. This is not a proper procedure and is one of the areas covered with all new employees in stressing the importance of accumulated dosage.

#### NRC Response

The NRC agrees that it is not proper to zero dosimeters after each exposure. The questions regarding zeroing the dosimeters were not intended to imply they routinely should be zeroed after each exposure, but rather to determine the actual process for zeroing dosimeters. This clarification was sought because your procedures do not clearly specify a zeroing frequency, but specify: "Dosimeters should be zeroed at the start of each work day and periodically thereafter to assure proper functioning." In addition, the answers to your radiography test specify, "The dosimeter should be zeroed daily, before and after starting a radiography operation." In view of this apparent ambiguity in your procedures, the inspector questioned the radiography personnel to determine the frequency of zeroing the dosimeters and if they were zeroing the dosimeters periodically during the day, how they were recording the dose received. The radiographers had a clear understanding that dosimeters were not to be routinely zeroed after each shot.

#### Licensee Comment

During the inspection, a licensee representative asked Mr. Mumper if he checked all equipment including survey meter, dosimeters, film badges and alarm rate meters. Mr. Mumper did and said all were in calibration. However, Mr. Mumper did not check the ratemeter for its audible performance. The licensee considers this to be a very useful and necessary piece of equipment, as had this been a circumstance that the source came unhooked or did not

retract into the camera, the ratemeter would have been the savior of an overexposure. A licensee representative asked Mr. Mumper why he did not check this, and he said he did not have a pen.

#### NRC Response

The NRC, in determining the safety significance of the failure to adequately survey the radiographic exposure device, was cognizant of the fact that the radiographic personnel possessed and used alarm ratemeters as required by 10 CFR 34.33. Although Mr. Mumper did not test the alarm function on the alarm ratemeters, he did ask the radiographers if they had checked the alarm function on the alarm ratemeters that day and they responded in the affirmative. Had such equipment not been operable or in use, this failure would have resulted in further enforcement action.

#### Licensee Comment

After the exit interview and after the inspectors left the facility, the two radiographers entered the back entrance of the facility. A licensee representative attempted to find the inspector so that the licensee representative could demonstrate the procedure in which these men would be retrained. The licensee representative was unable to catch the inspectors before they left.

#### NRC Response

With regard to corrective actions, the NRC was aware, based on your August 25, 1993, letter that radiographers had been retrained in proper survey procedures and that the president of the company had inspected radiographers' performance of surveys in the field. These corrective actions were considered in establishing the civil penalty imposed.