

CONSOLIDATED NDE, INC.

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February 5, 1991

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Docket No. 030-20787
EA No. 90-060

Subject: Mr. James Lieberman, Director
Office of Enforcement

Gentlemen:

Subject: Response required by January 2, 1991 letter relating to
Violation E.1 of May 2, 1990 Notice of Violation.

After further review, Consolidated NDE, Inc. cannot verify that, at the start of production radiographic operations, a perimeter survey was either performed or adequate for the purposes intended.

However, concerns remain over the NRC opinion that perimeter surveys are required solely due to a change in the position of the collimated source inside an established restricted area. Despite this concern, it is counter-productive to deny the entire violation because of a disagreement relating to that point. This is particularly true, because the area was not properly posted or restricted.

Immediate Corrective Action:

All radiography staff were reinstructed in the activities necessary to ensure proper perimeter surveys are performed. The instructions did specifically address physical deployment for the purpose of perimeter surveys at the start of production radiographic operations. The reinstruction was completed by May 10, 1990. All personnel hired after that date were given identical instructions.

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The individual radiographer was suspended without pay for a period of two weeks and received an additional 20 hours of refresher training. The individual radiographer's assistant was suspended without pay for a period of one week and attended a 40 hour radiation safety training course presented by an approved agency.

Monetary penalties were assessed and collected.

Future Corrective Action:

Rope and other substitutes are utilized to establish restricted area perimeters at all field operations where physically possible.

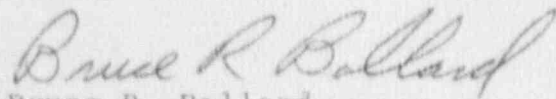
Extra emphasis is now placed on present and future field inspections of radiographic operations. Inspections conducted by radiation safety management have been more frequent and thorough than at any time previous.

These inspections have shown no repetitive violations of this nature.

Additional Note:

Consolidated NDE, Inc. must again stress the intent of the current O&E Manual as to perform radiation surveys initially. If the work is repetitious with similar radiation scattering characteristics, no further boundary surveys are necessary.

Sincerely,



Bruce R. Ballard
Radiation Safety Officer
Consolidated NDE, Inc.