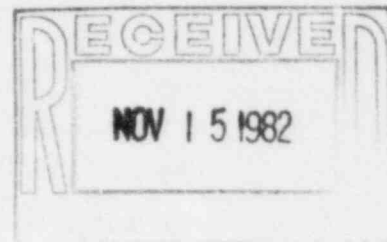




INSPECTION & TESTING, INC.

4990 Valenty Rd. - Chubbuck, Id. 83202  
P. O. Box 2688, Pocatello, Id. 83201-1688 • (208) 237-1055

November 11, 1982



Mr. John T. Collins  
Regional Administrator  
Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

30-19532

Dear Sir:

This letter constitutes response to the Nuclear Regulatory Commission's (NRC) Notice of Violation to Inspection & Testing, Inc. (ITI), license No. 11-19921-01, dated October 25, 1982 and received at ITI on October 28, 1982.

There were eight (8) violations identified by the NRC Enforcement Inspector, Mr. D. B. Spitzberg and acknowledged by the RSO of ITI. I shall categorize ITI's response directly to the violations, by number, as they are listed in the Notice of Violation in the following manner:

1. Violation

- (a) Corrective steps taken and results
- (b) Corrective steps to be taken to avoid further violations
- (c) Date full compliance will be achieved

1. Conduct of licensed activities by technically unqualified personnel.

- (a) Training records of personnel are to be kept in a centrally located, locked file under key control by the RSO and Assistant RSO. No personnel records pertaining to training, examinations and hands-on examinations will be moved from the ITI Corporate Offices located in Pocatello, Idaho. Trainees, Assistant Radiographers, and Radiographers have had additional instructions as to their specific job functions. New employee's are instructed in their job functions and are asked to sign an affidavit to that effect. Employee's of long standing have also signed the same affidavit. ITI feels that these employees understand their job functions in relation to the Administrative, Operating and Emergency Procedures Manual (AOEPM).

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- (b) New employee's records of training and examination shall be kept in a locked file under key control by the RSO. Job functions shall be explicitly explained to each employee.
  - (c) Full compliance has been achieved on this date.
2. Failure to conduct required leak tests.
- (a) All sources now in ITI possession have been leak tested in accordance with the requirements of 10 CFR 34.25 (b) and (c).
  - (b) Management has placed the leak test requirements of 10 CFR 34.25 (b) and (c) on a calendar response of January and July. All sources in the possession of ITI shall be leak tested in those months, regardless of the age of the source. This requirement shall begin in January of 1983. All sources having a leak test due prior to January 1983 shall have a test performed when required.
  - (c) Full compliance has been achieved on this date.
3. Failure to notify NRC with individuals radiation exposures upon termination from employment.
- (a) ITI has submitted radiation exposures of personnel to the NRC of all employees that have terminated since ITI received an NRC license.
  - (b) ITI shall submit radiation exposures to the NRC on all personnel who terminate their employment. ITI shall submit these histories within the time frames established by 10 CFR 20.408.
  - (c) Full compliance has been achieved on this date.
4. Failure to notify individuals of radiation exposure upon termination of employment.

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- (a) ITI has notified all individuals, who have terminated employment, of their radiation exposure while employed at ITI.
  - (b) ITI shall notify all individuals of their radiation exposures, upon termination from employment, in accordance with the requirements of 10 CFR 20.408.
  - (c) Full compliance has been achieved this date.
5. Failure to keep records showing receipt, transfer, and disposal of by-product material.
- (a) ITI has notified all employees that all received or transferred sources shall be reviewed by the RSO or the Assistant RSO. Proper documentation shall be and has been accomplished by the RSO or the Assistant RSO.
  - (b) Personnel have been instructed in the proper procedure for receiving and transfer of by-product material in accordance with the ITI AOEPM. Management shall periodically review the documentation to assure that it is properly accomplished.
  - (c) Full compliance has been achieved this date.
6. Failure to conduct quarterly inspections on radiographic exposure devices.
- (a) ITI has conducted the required exposure device inspections although they were later than the three (3) month requirement. These inspections are now up to date.
  - (b) ITI has placed the requirements of 10 CFR 34.28 (b) on a calendar quarter beginning in January 1983. Quarterly inspections shall be accomplished during January, April, July and October on an annual basis.
  - (c) Full compliance has been achieved this date.

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7. Failure to properly placard a vehicle transporting by-product material.
  - (a) Corrective action has been taken to insure that magnetic type signs are not utilized on material that cannot assure a good seal. The truck in question has now been properly placarded.
  - (b) All vehicles shall be periodically inspected to assure that the placards are readable, properly distributed and generally in good shape. If signs need to be replaced, personnel will inform the RSO or Assistant RSO and they will replace them.
  - (c) Full compliance has been achieved this date.
  
8. Failure to notify the NRC for proposed activities in nonagreement states.
  - (a) ITI assures the NRC that the intent to properly notify them was there. ITI shall adhere to the requirements of 10 CFR 150.20 in the future.
  - (b) Proper communication with the NRC is the responsibility of the RSO and the Assistant RSO.
  - (c) Full compliance has been achieved this date.

Enclosed for your information are the following:

1. Sample of personnel affidavits
2. ITI Organizational Chart

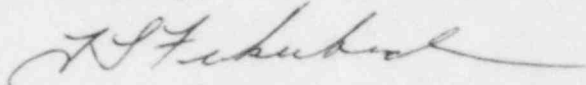
Management is concerned about these violations. Management has taken action to increase the training sessions with personnel concerning radiation safety. Personnel are receiving more frequent sessions than is required by the AOEPM, either individually or in a group. Management has designated two (2) individuals as Radiographic Supervisors to assist management in the responsibilities of radiation safety. These individuals were selected due to their backgrounds and experience in working with isotopes and x-ray generating machines. These individuals are listed below:

Mr. Charles E. Robbins  
Mr. Vince V. Archibald

Mr. John T. Collins  
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November 11, 1982

If I may be of further service or answer any questions about the above, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "T. L. Finkenbinder".

T. L. Finkenbinder  
President

TLF:njd

Enclosures



INSPECTION & TESTING, INC.

4990 Valenty Rd. - Chubbuck, Id. 83202

P. O. Box 2688, Pocatello, Id. 83201-1688 • (208) 237-1055

TO: All Inspection & Testing, Inc. Employees

FROM: T.L. Finkenbinder & W.H. Shamel

SUBJECT: Radiation Safety

It has come to our attention during the recent NRC Audit that personnel employed by ITI are not properly posting and surveying restricted radiation areas.

All of the personnel employed by ITI have been instructed in the proper method of posting and surveying restricted areas. Each darkroom is equipped with a copy of the Operating and Emergency Procedures Manual and all of you have been instructed in its contents. Further instruction has been for personnel to do some self-study and reading of this manual.

Attached is a declaration that you have read and understand the Operating and Emergency Procedures. Please sign and return to this office.

In the future, deviation from these procedures will bring immediate dismissal of both radiographer and assistant. Both T.L.F. and W.H.S. shall increase their observations of field operations until we are satisfied that the Operating and Emergency Procedures are followed. These will be unannounced surveys.

INSPECTION & TESTING, INC.

T.L. Finkenbinder  
President

I, \_\_\_\_\_, have read and understand that any deviations from strictly performed radiation safety procedures will lead to my immediate dismissal.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



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Administrative, Operating and Emergency  
Procedures Manual

I, \_\_\_\_\_, have access to and have read and understand the Operating Procedures (Section 3) and Emergency Procedures (Section 4) of the Inspection and Testing, Inc. Administrative, Operating and Emergency Procedures Manual.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_



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