



## HIGH STEEL STRUCTURES, INC.

May 25, 1994

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: REPLY TO A NOTICE OF VIOLATION

Reference: Docked No. 030-12926  
License No. 37-17534-01

This letter is being issued in response to the enclosed "Notice of Violation" issued May 16, 1994, that details the violations identified during an NRC inspection conducted on April 21 and 22, 1994.

### VIOLATION 1

The first violation involved a pocket dosimeter (Serial No. C033104) that was used by a radiographer on April 21, 1994; however, it had not been checked for correct response to radiation since April 12, 1993, a violation of 10 CFR 34.33(c).

This violation was caused by a very unusual event. In order to insure that we have an adequate supply of dosimeters available for use during the calibration cycle (minimum of three days), only half the dosimeters are taken out of service for calibration. The first group of three dosimeters was calibrated on April 7, 1994; however, before the remaining dosimeters could be calibrated, two of the calibrated dosimeters were removed from service because they would no longer hold a charge.

After obtaining replacement dosimeters, three dosimeters were calibrated on April 22, 1994, and the two remaining dosimeters were calibrated on April 26, 1994.

To avoid this situation occurring in the future, calibration of the dosimeters will commence at an earlier date in order to insure that we have an adequate supply of calibrated dosimeters for use at all times. The calibration of the dosimeters has been placed on a PC based scheduling system that will issue a report to the RSO prior to the critical dosimeter recalibration date.

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P.O. Box 10008 Lancaster, PA 17605-0008

(717) 299-5211

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VIOLATION II

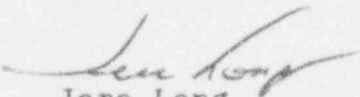
10 CFR 34.42 requires that areas in which radiography is performed will be conspicuously posted. 10 CFR 20.1902(b) requires posting of signs bearing radiation caution symbols and words: "Caution, High Radiation Area or Danger, High Radiation Area".

We have always complied with this requirement by attaching the "Caution, High Radiation Area" signs to the exposure device stand. However, occasionally due to the location of the weldments being radiographed, it is necessary to add additional shielding, i.e. lead plates, to keep the radiation area boundary within the visual control of the radiographer.

Upon notification on May 3, 1994, that this condition was determined to be a violation of 10 CFR 34.42, additional "Caution, High Radiation Area" signs were obtained and attached to the lead shields on May 10, 1994. This action will allow us to continue to use the shields when necessary and still meet the requirement that they be conspicuously posted.

Please call me if you have any questions or need any additional information at (717)390-4253.

Sincerely,

  
Jere Long  
Radiation Safety Officer

Enclosure:

cc: P. Loftus, HSS  
U.S. NRC, Region I

APPENDIX A

NOTICE OF VIOLATION

High Steel Structures, Inc.  
Lancaster, Pennsylvania 17605-0008

Docket No. 030-12926  
License No. 37-17534-01

During an NRC inspection conducted on April 21 and 22, 1994, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 34.33(c) requires that pocket dosimeters be checked at intervals not to exceed one year for correct response to radiation.

Contrary to the above, a pocket dosimeter (Serial No. C033104) worn by an employee who performed radiographic operations on April 21, 1994, had not been checked for correct response to radiation since April 12, 1993.

This is a Severity Level IV violation (Supplement IV).

- B. 10 CFR 34.42 requires that areas in which radiography is being performed will be conspicuously posted as required by 10 CFR 20.1902(b).

10 CFR 20.1902(b) requires that each high radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbols and the words: "Caution, High Radiation Area or Danger, High Radiation Area".

Contrary to the above, on April 21, 1994, an area in which radiography was being performed was not conspicuously posted as required by 10 CFR 20.1902(b). Specifically, the radiographer placed a "Caution, High Radiation Area" sign on each side of an exposure device stand. However, prior to the commencement of actual radiography operations, he placed a lead plate (shielding material) against each side of the stand; thus, completely obscuring the two signs from view.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, High Steel Structures, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken

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and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.