

DEC. 28 1990

Docket No. 030-19223

License No. 20-19778-01

ABC Testing, Inc.
ATTN: Mr. Carleton A. Richardson
President
95 First Street
Bridgewater, Massachusetts 02324

Sir/Madam:

Subject: Inspection No. 030-19223/90-001

This correspondence refers to your letter dated October 31, 1990, in response to our letter dated October 2, 1990. Thank you for informing us of the corrective and preventive actions documented in your response to our correspondence. However, relative to your comments the following pertains:

1. Violation A, relative to 10 CFR 20.105(b)(1), requires the Licensee to assure that the use and possession of radioactive materials is controlled, such that at no time will radiation in an unrestricted area be greater than 2 millirem in any one hour. This specification does not allow for radiation in excess of this limit, even for initial radiography set-up. The Licensee is required to assure that radiation levels in unrestricted areas are always within the regulatory limit, unless excepted by the Commission.

Please confirm your understanding of this violation and identify your corrective actions according to the instructions provided in Appendix A of our previous letter.

2. In response to item B, you have implied that the NRC inspectors expected your radiographers to zero their dosimeters. The violation is for the radiographers failure to recharge their pocket dosimeters at the start of the shift. Your radiographers admitted to the inspectors that they did not recharge their dosimeters at the start of the shift. The inspectors read the dosimeters and recorded the results as 20 and 28 millirem.
3. We welcome constructive criticism of our inspection activities by Licensees, and usually find it useful for the performance and maintenance of our inspection and licensing programs. We have reviewed this inspection with Messrs. Thompson and Dwyer. Based on our understanding of their activities from (1) interviewing the individuals following the inspection, and (2) a previous telephone discussion between you and Mr. John R. White of my staff, on June 29, 1990, we have found no specific fault with either of the inspectors' technique, performance, or professionalism. However, as is our policy, we will continue to inform our staff of the need to conduct inspection and licensing activities in a critical, but professional manner. While we do not agree with your characterization of this particular inspection, we do appreciate, and are sensitive to, your opinion.

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Please submit to this office a written statement relative to our request for information as identified in Item 1. Thank you for your cooperation.

Sincerely,

Original Signed by

Ronald R. Bellamy

fa

Malcolm R. Knapp, Director
Division of Radiation Safety
and Safeguards

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Massachusetts

bcc:
Region I Docket Room (w/concurrences)

TKT
RI:DRSS
Thompson/bj

12/14/90

White
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White

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Bellamy
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Bellamy

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