



**Professional Service Industries, Inc.**  
Corporate Office

December 4, 1990

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

Attention: John R. White, Chief  
Nuclear Materials Safety Section C  
Division of Radiation Safety  
and Safeguards

Re: License No. 37-00276-25  
Docket No. 030-05985

Dear Mr. White:

Professional Service Industries, Inc. (PSI) is in receipt of your letter dated 11/6/90, regarding the Notice of Violation (Appendix A) resulting from an inspection of PSI's Pittsburgh facility. The following is submitted in response:

In accordance with section 4.2.2 (a) of Part A of the PSI/PTL procedures, field audits of radiographic personnel are performed at a *minimum of one each calendar quarter*. Quarterly reminders of field audits are sent to each radiography office notifying the RSO that a field audit must be performed before the end of the current calendar quarter. Since the field audits were not tracked by date, it was possible that the interval between audits may exceed 3 months. Records indicate the field audits for the radiographer in question were performed on 4/20/90 and again on 9/27/90. The violation of 10 CFR 34.11(d)(1) is acknowledged.

PSI discovered the discrepancy between the regulations and the currently licensed procedures. Since the performance of radiographic personnel field audits at intervals not to exceed three months is more restrictive than the licensed procedures (as required by Condition 18 of the license), field audits of radiographic personnel will be performed at intervals not to exceed three months.

9101110102 910102  
REG1 LIC30  
37-00276-25 PDR

License No. 37-00276-25  
December 4, 1990  
Page Two

A data base will be created to track radiographer field audits by date. This data base will allow reminders to be sent to the respective RSO prior to the date of the upcoming audit. (Due to possible delays at the end of year, creation of the data base is expected to be completed by 1/31/90.) Full compliance with 10 CFR 34.11(d)(1) and applicable license conditions will be achieved at that time.

If I have failed to address any items of noncompliance, or should you have any questions, please do not hesitate to contact me.

Sincerely,

PROFESSIONAL SERVICE INDUSTRIES, INC.



David S. Prico  
Radiation Safety Director

DSP/JTT/lse



INTERNAL RADIATION SAFETY PERFORMANCE AUDIT

2<sup>ND</sup> CALENDAR QUARTER 1990

TO: Radiation Records FROM: PITTSBURGH NDE DATE: 4-20-90  
On 4-20-90 a Radiation Safety Inspection was conducted at \_\_\_\_\_

VINCENT WELDING WEST ELIZABETH

PERSONNEL AND MONITORING

Radiographer <u>PAUL FERRIS</u>	Assistant Radiographer <u>MIKE KRIZMANICH</u>
Film Badge No. <u>2896</u>	Film Badge No. <u>09008</u>
Dosimeter Pencil No. <u>0043</u>	Dosimeter Pencil No. <u>12488</u>
Dosimeter Response Date <u>12-19-90</u>	Dosimeter Response Date <u>1-10-90</u>

RADIOGRAPHIC AND MONITORING EQUIPMENT

Radiographic Device Make <u>GAMMA</u>	Survey Meter Make <u>RADECTOR</u>
Model No. <u>CENTURY</u>	Model No. <u>500</u>
Serial No. <u>2594</u>	Serial No. <u>4481 / 4482</u>
Date Leak Tested <u>2-6-90</u>	Date Calibrated <u>3-5-90 4-8-90</u>

SAFETY REQUIREMENTS

License & Procedures Available? <u>YES</u>	Dosimeter Records Available? <u>YES</u>
Survey of Transport Vehicle <u>&lt; .5</u> Mr/Hr	Film Badge & Dosimeter at Proper Location? <u>YES</u>
Radiation Level at Surface of Exposure Device <u>90</u> Mr/Hr., @ 6" <u>30</u> Mr/Hr.	
Barricades Posted Properly? <u>YES</u>	Maximum Reading at Perimeter <u>2.3</u> Mr/Hr.
"High-Radiation Sign" Posted? <u>YES</u>	Approximate Isotope Strength? <u>64</u>
Exposure Device Properly Labeled? <u>YES</u>	Device Locked after each Exposure? <u>YES</u>
Survey Performed after each exposure? <u>YES</u>	Surveyed entire length of source tube? <u>YES</u>
Form RR12-3 completed? <u>YES</u>	Is Radiographer Competent? <u>YES</u>

ADDITIONAL FINDINGS

List any discrepancies found that are not mentioned above and/or additional personnel.

If unable to conduct Radiation Safety Inspection, describe circumstances here.

MANAGEMENTS CERTIFICATION

I certify that the above Radiation Safety Inspection was conducted by me on 4-20-90.

PGH NDE DISTRICT      Wenust-Lansen RSO SIGNATURE AND TITLE

PROFESSIONAL SERVICE INDUSTRIES INC.  
RADIOGRAPHY RADIATION SAFETY AUDIT - FIELD

3 CALENDAR QUARTER

PITTSBURGH, NDE

Date of Inspection: 9-27-90

~~JOSEPH W. ...~~  
TENNIS T. ...

Location of Inspection: WEST END MINNAPATE CRYPT

Radiographer: PAUL FERRIS & MIKE KRIZMANICK

Assistant Radiographer: PAUL FERRIS

RADIOACTIVE MATERIALS LICENSE AND OPERATING AND EMERGENCY PROCEDURES:

1. Licenses:

A current copy of the Radioactive Materials License must be present with each radiographer.

1. What is the license number? 37-00270-25

2. What is the expiration date? JULY 31 1992

3. What is the license location? NRC

If ever performing radiographic operations outside of the primary license area (except another state or military reservation) a formal notification must be made.

1. What method of notification was used? \_\_\_\_\_

2. Are regulations, for agreement states in which work is performed, present for review? \_\_\_\_\_

3. List any radiographer(s) that do not have current copies of the current license.  
\_\_\_\_\_  
\_\_\_\_\_

2. Procedures:

A current copy of the PSI Operating and Emergency Procedures must be present with each radiographer for use.

1. According to the license, what is the date of the procedures currently authorized?  
4-1-87

2. What is the date of the procedures in use? 4-1-87

3. List any radiographer(s) that do not have a current copy of the "Operating and Emergency Procedures".

1. \_\_\_\_\_ 2. \_\_\_\_\_

3. Regulations:

All agreement state licensee's must have a copy of state regulations on file for review. All NRC licensee's must have parts 19, 20, and 34 of title 10 CFR (Code of Federal Regulations) as a minimum.

1. What is the title and date of the regulations? NA

2. What sections of the regulations are present? 19, 20, 34 of Title 10 CFR

**INSTRUMENTS AND MONITORING EQUIPMENT:**

Personal Monitoring:

1. Radiographic personnel must have a dosimeter pencil and film badge.  
2. All dosimeters must be calibrated annually or they cannot be used.

1. Radiographer: MIKE KRIZMANICH  
 a. Film Badge No. 04008 Film Badge Date: 8-25-90  
 b. Dosimeter Pencil No. 12488 Dosimeter Response Date: 1-10-90  
 2. Assistant/Radiographer: PAUL FERRIS  
 a. Film Badge No. 02896 Film Badge Date: 8-25-90  
 b. Dosimeter Pencil No. 0043 Dosimeter Response Date: 12-19-89

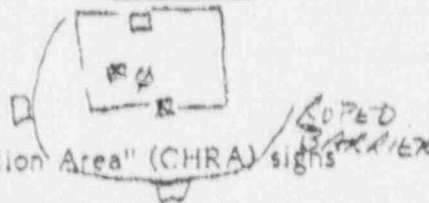
Survey Meters:

1. List all survey meters present at the job which are in use for radiography, their calibration date and condition.

Model	Serial Number	Calibration Date	Condition
1. <u>Model 520</u>	<u>4349</u>	<u>9-12-90</u>	<u>GOOD</u>
2. _____	<u>607</u>	<u>8-27-90</u>	<u>GOOD</u>
3. _____	_____	_____	_____

**RESTRICTED AREAS AND SURVEYS:**

1. "Caution Restricted Area" (CRA) and "Caution High Radiation Area" (CHRA) signs are required to be posted on field assignments.



2. Review the job area and complete the following:  
 a. Location of <sup>CRA</sup> signs: 5' from source on Stanchion  
15' over door (locked)  
 b. Location of <sup>CHRA</sup> signs: opposite side of Bldg @ ~105'  
Maped Barrier ~ 70' from Bldg

QUESTIONS:

1. At what distance are the CHRA signs placed? 5' & 15'  
 2. What is the survey reading at the restricted boundary? .7 mR  
 3. What surveys did the radiographer perform? Survey the  
Maped Barrier  
 4. What was the maximum survey reading at the exterior of the transport vehicle? NA



EQUIPMENT:

1. Radioactive Devices:

A. Each radioactive device must have proper safety warning labels and D.O.T. placards. Inspect the device and complete the following:

- 1. Device Make and Model: GAMMA CENTURY
- 2. Serial Number: 1546
- 3. Leak Test Date: 6-1-90

4. Verify that a tag or label is affixed to the unit listing the source information. Complete the following from the tag:

- a. Source type: A1A
- b. Approximate strength (at time of audit): 38ci
- c. Loading Date: 6-1-90

5. Verify that all warning labels and unit identification plates, or tags are on the unit.

- a. What labels and tags are on the unit? CAUTION RADIOACTIVE MAT'L, NAME PLATE, LEAK TEST STICKER
- b. State their condition: GOOD/READABLE

- c. List any that should be replaced: NONE
- d. What is the condition of the unit? GOOD

1. Shipping Containers:

A. Each shipping container must have proper safety warning labels and D.O.T. placards. Inspect the device and complete the following:

1. Describe the shipping container utilized for this device: NEW

2. Verify that all D.O.T. labels are present on the shipping container. (Note: Two Yellow II or two Yellow III labels must be used. They cannot be mixed). What D.O.T. labels are on the container? YELLOW II (ALTHOUGH, STICKER SHOULD BE CURIES INSTEAD OF 38 CURIES)

3. What is the label condition? GOOD

4. List any labels that should be replaced: NONE

5. What is the condition of the shipping container? NEW

RR-19  
REV: 9-1-90

DEFICIENCIES:

List the deficiencies found in the following categories and corrective action which will be taken.

1. Radioactive Materials License and Operating and Emergency Procedures: \_\_\_\_\_

\_\_\_\_\_

2. Personnel and Monitoring Equipment: \_\_\_\_\_

\_\_\_\_\_

3. Warning Signs and Surveys: \_\_\_\_\_

\_\_\_\_\_

4. Equipment: \_\_\_\_\_

\_\_\_\_\_

CONCLUSIONS:

4. Radiographer Certification:

State that the above audit was performed at the above indicated location on the above date.

Mike Krimanich Mike Krimanich  
Radiographer (Printed Name/Signature)

5. RT/ARSC Certification:

State that the above audit was conducted by me on the above date and above location.

Thomas T. Kaiser Kenneth Kaiser  
Radiation Safety Officer (Printed Name/Signature)

David Nalepa Joseph Stojan ARSC

20 DEC -2 1990

Attach - Radiation Records  
by - Branch Files

150-111-46 PSI-PIL-FRM