

cc: msh

July 14, 1994

U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323-0199

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Attn: Regional Administrator

Re: Supplemental Response to Notice of Violation
Docket No. 030-32883
License No. 42-25214-01

Dear Sir:

Referencing Mr. Stohr's correspondence dated June 16, 1994 concerning our May 27, 1994 response we are providing the following additional information regarding Violations A and D:

Violation A

Pursuant to the findings of our internal audit performed in September of 1993 it was determined that while the utilization of incoming TLD reports referenced in our February 17, 1993 correspondence may have been an effective way of determining what individuals were occupationally exposed thereby requiring audits within three months periods the TLD reports were not adequate for ensuring the audits were performed in a timely manner. To ensure that audits are now performed in a timely manner our Project Manager/RSO maintains an audit log to determine when an individual is due for an audit. The individual's name is first entered into the log when he initially performs radiography. We believe this system to be more effective than monitoring incoming TLD reports which often are received two to four weeks after badges are returned to the supplier. Additionally, with the drastic reduction of radiography personnel from 32 to the current work force of 4 to 6 we are confident that the reduced number and the personal involvement of our Project Manager/RSO will make our program more manageable to insure timely audits.

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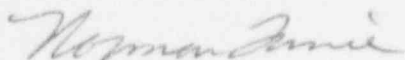
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Violation D

During the construction stage of our customer's project the administrative demands on our Project Manager/RSO were as such that he had to delegate certain responsibilities of our radiation safety program to other individuals. Consequent to the permanent work load reduction resulting from the new construction completion our customer's plant facility our Project Manager/RSO, Michael Ray, has personally assumed the responsibility of conducting periodic refresher training and safety training meetings. at intervals not to exceed three months. Mr. Ray's active participation will prevent the recurrence of this violation.

Should additional information be required please do not hesitate to contact us.

Respectfully,



Norman P. Lanier
Radiation Safety Director

NPL/nl

cc: M. N. Bhagat
TWL President

Michael Ray
TWL Radiation Safety Officer
St. Croix, USVI

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