

**Cramer & Lindell Engineers**

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August 4, 1994

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Response to Notice of Violation

Reference: a) Routine Inspection No. 030-22082/94-001

The following is in response to the findings of the subject inspection conducted on June 13, 1994, as documented in reference (a.). The response below corresponds to items A.1, A.2, and Item B of Appendix A of your Notice of Violation.

Item A.1 (Response)

The radiographer did fail to ensure that the restricted area was less than 0.002 rem (0.02mSv), during the exposure. This is in direct violation with our safety manual, which states the unrestricted area shall be posted at the 2mr/hr. boundary. The present 10 CFR 20.130/(a)(2) requires an unrestricted area not to exceed 0.002 rem (0.02mSv) in any one hour. Based on this Part 20 requirement, there is conflict with our manual wording. Based on calculations the radiographer did not exceed the 0.002 rem in any one hour requirement.

Item A.2 (Response)

The radiographer having initially surveyed the perimeter of the fenced area obtained readings of $\leq 1\text{mr/hr}$ as they were exposing the source in the center of the 150'sq. of fenced area. At the end of the day they had to move closer to one fence and upon surveying their survey meter read $\leq 2\text{ mr/hr}$. Only a few exposures were taken in this area, and based on the readings obtained the radiographer did not feel posting was needed. The NRC auditors meter read $\leq 4\text{ mr/hr}$. in this area. Access to the fenced in area (8 ft. high with barbed wire) was roped off and posted at the only entrance.

• Corrective Steps Taken And Results Achieved

The radiographer and assistant radiographer involved in the field audit were advised of the nature of the violations, and a discussion of the Part 20 requirements vs the wording in our safety manual took place.

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-2-

August 5, 1994

• Corrective Steps Taken And Results Achieved Cont'd

They were advised that anytime radiography is performed (regardless of the security and remoteness of the work area) the 2 mr/hr boundary shall be posted at all times. All C&L radiographers have been advised that all boundaries shall be posted and no Iso-Dose calculations to circumvent posting is allowed.

• Corrective Actions Taken to Avoid Further Violations
(Items A.1,.2)

To reiterate, all radiographers were advised during annual radiation safety training of the new Part 20 requirements and how they apply to industrial radiography. We will continue to perform the scheduled quarterly radiographer audits with added emphasis on the 2 mr/hr. boundary, and posting requirements. Each mobile darkroom is equipped with more than adequate rope and signs, and there is no excuse for not posting a boundary.

• Date of Full Compliance

Date of full compliance has been achieved based on subsequent annual safety training of all radiography personnel. Part of the safety training included review and discussion of the NRC video tape "Taking Control" Safety Procedures for Industrial Radiographers. Training took place on 5/1/94, 6/20/94 and 6/21/94.

Item B (Response)

The radiographer failed to change the Yellow II Label on the source transport storage box the day of the audit. There is no excuse in defense of this violation.

Corrective Steps Taken and Results Achieved

The radiographer and assistant radiographer were advised of this violation, and were instructed as to proper shipping documentation of sources. Again, during annual radiation safety training all radiography personnel were given reference material about proper shipping of radioactive materials. This is in addition to requirements contained in our safety manual. The shipping requirements are a regular subject during refresher training. It is apparent the RSO and Assistant have to be more diligent during radiographer audits concerning shipping documentation. All radiography personnel at this date are complying with shipping requirements of DOT 49CFR Part 170-189.

TRUST

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk

-3-

August 5, 1994

Corrective Actions Taken To Avoid Further Violations

On a daily basis prior to leaving our facility, the RSO and/or his Assistant is verifying the proper transport index is filled in on the Yellow II Stickers. This should alleviate any future violations. Date of compliance has been achieved as of this report date.

We hope you find our response to the violations noted acceptable. If you require further information, please contact me @ (203)691-4614. Thank you for your cooperation in this matter.

Very truly yours,

William E. Cramer GENERAL MANAGER FOR
C.W. Lindell
Assistant General Manager

cc: Regional Administrator, USNRC Region 1
DMOrlosky
WECramer
TPayne