

APR 18 1991

License No. 53-23225-01

Walashek Enterprises, Inc.  
607 Ala Moana Blvd., Pier 1  
Honolulu, Hawaii 96813

Attention: Mr. Joe Manalo  
President

Gentlemen:

Thank you for your letter dated April 1, 1991, informing us of the steps you have taken to correct items which we brought to your attention in our letter dated March 8, 1991. Your corrective actions will be verified during our next inspection.

Your cooperation with us is appreciated.

Sincerely,

Robert J. Pate, Chief  
Nuclear Materials and Fuel  
Fabrication Branch

bcc w/copy of letter dated 4/1/91:

- docket file
- State of Hawaii
- A. Johnson
- G. Cook
- B. Faulkenberry
- J. Martin
- J. Zollicoffer
- M. Smith

REGION V

DSKov *[Signature]*  
4/18/91

RJPate *[Signature]*  
4/18/91

REQUEST COPY	REQUEST COPY
YES / NO	YES / NO

SEND TO PDR
YES / NO

9104230064 910418  
REG5 LIC30  
53-23225-01 PDR

*TE0711*

# WALASHEK INDUSTRIES

CORPORATE HEADQUARTERS: Pier 1, 607 Ala Moana Blvd. • Honolulu, HI 96813 808-523-7526/FAX 808-523-7529

1 April 1991

RECEIVED  
INRC  
REGION V  
1991 APR - 5 PM 2:50

United States Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596-5368

Docket No.: 030-20386  
License No.: 53-23225-01

RE: Reply to Notice of Violation  
Dated: 8 March 1991  
Received: 13 March 1991

Gentlemen:

This letter refers to the requirement provisions of 10 CFR 2.201 referencing the violations listed on your Notice of Violation to Walashek Industries received on 13 March 1991.

- Violation A.) Re: 10 CFR 34.43 (b) requires the Licensee to ensure that a survey with a calibrated and operable radiation survey instrument is made after each exposure to determine that the shielded source has been returned to it's shielded position.
- 1.) Walashek Industries does not contest or dispute the violation. Although, upon investigation by Walashek Industries RSO let it be noted a partial survey was accomplished by the Radiographer.



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When questioned as to the proper survey method the radiographer answered correctly, "All four sides of the exposure device including guide tube." Thus it is the fact that the radiographer did not complete an adequate survey but was knowledgeable as to the required survey.

- 2.) The corrective steps taken were to call a meeting of all Licensee personnel to discuss surveys and the strictest compliance to accomplish a 100% survey. Please note: We employ the Industrial Nuclear Model Exposure Device with the Safety Lock that pops up upon full retraction of the source. The radiographer in question says that during a survey he tends at times to notice the lock in place and therefore conducts only a partial survey. During this meeting all Licensee personnel were thus told that there are no exceptions to full compliance regarding surveys and they shall be executed upon completion of each and every exposure. Results achieved have been 100%.
- 3.) The corrective steps to avoid further violations shall be as follows: Walashek Industries RSO or Assistant RSO shall be present prior to, during, and upon completion of each Radiographic Operation to insure compliance with all EOP, CFR, and NRC Rules and Regulations.
- 4.) Full compliance shall be 4/1/91.

Violation B.) Re: 10 CFR 34.41 - During each Radiographic Operation, the Radiographer or Radiographer Assistant shall maintain direct surveillance of the operation to protect against unauthorized entry into a high radiation area.

- 1.) Walashek Industries does not contest or dispute this violation. The violation occurred when the Radiographer in question was on a jobsite alone. Although both his 2 MR/HR and 100 MR/HR

boundaries were in place, he did not walk the full perimeter of the boundaries. When questioned, the Radiographer stated he felt secure as to no one making an inadvertent entry into his boundaries since he was working late at night in a somewhat deserted area, where he believed the chances of someone stopping were very small. He states there was no danger to the public's health or safety.

- 2.) The corrective steps that have been taken were to set in place a new minimum crew policy for Walashek Industries. The policy states that for a Radiographic Operation there shall be at least two qualified Licensee personnel, which will insure direct surveillance of boundaries. Results have been 100% in compliance.
- 3.) Corrective steps to be taken as to avoid further violations are listed in the above policy.
- 4.) Full compliance shall be 4/1/91.

Violation C.) Re: 10 CFR 34.33 (a) requires that the Pocket Dosimeters worn by Radiographers and Assistant Radiographers for personal monitoring during Radiographic Operations be recharged at the start of each work shift.

- 1.) Walashek Industries does not contest or dispute this violation. For the record please let it be noted that the Radiographer did not zero his Dosimeter prior to the start of Radiographic Operations on 13 February 1991.
- 2.) The corrective steps that have been taken are as follows: In a discussion with all qualified Licensee personnel, it was stated that there is no reason a charger should not be used prior to the start of an RT operation and that all Dosimeters are to be

zeroed out before an operation begins. Walashek Industries owns four Dosimeter Chargers.

- 3.) The corrective steps taken to avoid further violations are as noted on No. 3 of Violation A - Walashek Industries' RSO or Assistant RSO shall be present throughout the duration of all RT Operation which will enable said personnel to witness the zeroing out of Dosimeters prior to an RT Operation.
- 4.) Full compliance shall be 4/1/91.

Violation D.) Walashek Industries License Condition 16 requires, in part that the Licensee conduct it's program in accordance with the statements, representations, and procedures included in the application dated April 8, 1985 and letter dated May 30, 1985. Section 2.2 of Walashek Industries EOP states to rope and post radiation area warning signs at the boundary of the restricted area where radiation levels of 2 MR/HR are measured during surveys at the start of Radiographic Operations.

- 1.) Walashek Industries does not contest or dispute this violation. The Radiographer is knowledgeable that under CFR 20.105 permissible levels of radiation in unrestricted areas should not exceed a dose of 2 MR in any one hour. Keeping in mind the exposure times during this operation and with no significant risk to the public's safety or health - he was not in compliance with Walashek Industries EOP during these exposures, and this incident was due to the negligence of the Radiographer.
- 2.) Corrective steps taken were utilized on the same RT incident in question, whereas sandbags and additional shielding was then utilized to lower the radiation level to 2 MR/HR at applicable restricted boundries. Results were 100% in compliance.

- 3.) The corrective steps that will be taken to avoid further violations are as noted on No.3 of Violation A.
- 4.) Full compliance shall be 4/1/91.

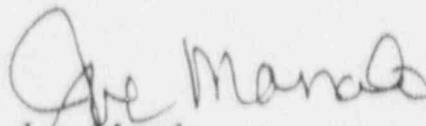
Violation E.) License condition 15/49 CFR 177.842 (d) requires that packages containing radioactive material be blocked and braced such that they cannot change position during conditions normally incident to transportation.

- 1.) Walashek Industries does not contest or dispute this violation. The Radiographer in question during transport of the exposure device had the device in a locked square steel box and all shipping documentation was available. As far as tying the box, securing the box, or bracing of the box, this was not accomplished. The Radiographer states that he had other equipment, a tool box, rope spools, and associated RT equipment - i.e. crank handle and guide tubes, set up in a way that the steel box could not move except in the case of an automobile accident, which hopefully is not termed as a condition normally incident to transportation. The travel for this particular RT operation was no more than 3-4 blocks.
- 2.) The corrective steps that have been taken are listed in No. 2 of Violation A. During this meeting with all Licensee personnel the fact of this requirement was also stressed.
- 3.) Corrective steps taken to insure against further violations are noted under No.3 of Violation A.
- 4.) Full compliance shall be 4/1/91.

Furthermore Walashek Industries would like to note that the Radiographer in question has been demoted to Assistant Radiographer effective 4/1/91. While being knowledgeable of all Governing Rules and Regulations, he will not be reinstated to Radiographer until such time as he demonstrates that he is exercising full compliance with our By-Product License #53-23225-01 and proves that the public's health and safety is the first and foremost consideration when undertaking Radiographic Operations.

Any questions you may have or any other help I may offer in answering these violations, please call me at (808)523-7526.

Sincerely Yours,



Joe Manalo  
RSC/President  
Hawaii Operations