



CBI Industries, Inc.

8900 Fairbanks North Houston Road
Houston, Texas 77064

Address Reply To: P.O. Box 41146
Houston, Texas 77241-1146

713 466 7481
Telcopier: 713 466 4259

September 25, 1991

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX. 76011

Attn: A. Bill Beach, Director
Division of Radiation Safety and Safeguards

Subject: License: 42-13553-02
Docket: 030-09727/91-01
Notice of Violation
Transmittal of August 9, 1991 Posted August 26, 1991

Gentlemen:

The following is in answer to the above referenced Notice of Violation.

Violation

License Condition 19 requires, in part, that the licensee shall conduct its program in accordance with statements, representations, and procedures contained in the letter dated July 31, 1985.

Item 2.7.4 of the "Isotope Radiation Safety Manual," enclosed with the letter dated July 31, 1985, specifies that district radiation safety officers (RSO) or their assistants will conduct quarterly jobsite inspection checks of radiographic operators to determine that license provisions and NRC regulations are followed. These inspections are to be documented on the licensee's radiography internal inspection checklist and maintained by the RSO for review.

Contrary to the above, the inspectors observed that one radiographer's assistant, who worked in Pennsylvania during the first and second quarters of 1991, had not been inspected during 1991 until April 24, 1991.

Response

This violation occurred as a result of the New Castle District Radiation Safety Officer (RSO) not noting the oversight in this assistant radiographer's records. Mr. Larry Rohrer replaced Mr. Alan Dahlberg the New Castle District RSO at the beginning of this year. In the process of this personnel change, the quarterly jobsite inspection of this assistant radiographer was overlooked.

9110090228 910925
REG4 LIC30
42-13553-02 PDR

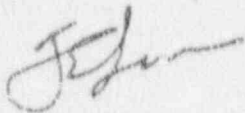
91-1658

IE-07

To more efficiently complete this personnel change process, Mr. Mohrer brought an experienced radiographer, Mr. Carl Kirk, into the New Castle District office to assist Mr. Huie and himself in the continued implementation of the isotope radiation safety program and associated documentation.

This extra step should prevent a recurrence of this violation.

Sincerely yours,



J. E. Sims
General Manager
Corporate Welding & Quality Assurance

CNS:cb