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JUN 6 1984

Docket No. : 030-08980
 License No.: 04-15365-01
 Control No.: 17469

Reactor Controls, Inc.
 Attn: Mr. Robert Crum
 Radiation Safety Officer
 1245 South Winchester Blvd.
 San Jose, California 95128

Gentlemen:

This is in reference to your application dated May 8, 1984 to renew your byproduct material license. In order to complete our review, we need the following additional information:

1. The outline of the initial training for radiographers as described in Section 3 of Attachment 6F which was submitted with your application dated May 8, 1984 did not reference training concerning the inspection and maintenance activities to be performed by the radiographers nor did it specify that there would be a discussion of case histories of radiography accidents, as required by 10 CFR 34.31. You should amend and re-submit your training outline to include these two items.
2. During our review of your Radiation Safety Test for radiographers (which was included in Section 4 of Attachment 6F to your application), we noted that no questions were included to test the radiographer's knowledge of the inverse square law or of the use of radioactive decay calculations.

Also, the correct answers were not indicated on the sample test which was submitted.

You should review the content of the examination and submit the revised test. The correct answers for each question should be indicated.

3. Attachment 6G which was submitted with your application states that the Radiation Safety Officer or his designee shall conduct inspections of the performance of radiographers and of radiographer's assistants on an annual basis. However, 10 CFR 34.11(d) states that personnel performance audits must be conducted at intervals not to exceed three months. If an individual has not participated in radiographic operations for a period in excess of three months, that individual's performance must be inspected the next time the individual engages in radiographic operations.

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Your procedures should provide a description of the personnel inspections and the qualifications and names of each person who may conduct the inspections on behalf of the Radiation Safety Officer. Refer to Item 6(g) of Regulatory Guide 10.6, copy enclosed. Please note that internal inspections should be made by a person of authority in management with a level of competence at or above that expected of a radiographer.

You should amend and resubmit your internal inspection procedures.

4. Although Item 5.1.21 of Attachment 6E of your application states that the exposure device must be kept under the constant surveillance of the radiographer or radiographer's assistant at all times, the operating procedure should also state that the radiographer and radiographer's assistant must maintain continuous surveillance over the restricted area, keeping all persons from entering, as required by 10 CFR 34.41. You should amend and re-submit this portion of your procedures.
5. Although Section 9 of Attachment 6E of your application states that the addresses and phone numbers of the persons to contact in case of an accident or emergency will be available at all locations concerned when radiography is being performed, they should also be listed in the procedure. Refer to Item h. of Appendix B to Regulatory Guide 10.6.

Also, Item 9.2 of Attachment 6E submitted with your application should be amended to identify your current Radiation Safety Officer as the person who will direct the recovery of any lost source.

You should amend and resubmit this portion of your procedures.

6. Item 5.1.24 of Attachment 6E states that dosimeter readings shall be recorded daily on the Radiation Survey Record and Utilization Log. However, we could not locate a space for such an entry on the form. You should indicate where the dosimeter readings made at the start and completion of each day's work will be recorded as required by 10 CFR 34.33.

Also, the "Radiation Survey and Utilization Log" indicates that a physical survey must be made before securing the exposure device. 10 CFR 34.43(c) requires that a record be made of the last survey prior to locking the radiographic exposure device and ending direct surveillance of the operation. Your instructions to personnel should clearly describe the requirement in 10 CFR 34.43(c) so that the proper survey is recorded. You should submit the instructions which will be given to personnel concerning this survey.

7. Your operating and emergency procedures should include instructions to be followed by the radiographers in the event that any malfunction or defect in the equipment is discovered. The instructions should tell the radiographer what to report, when to report the problem, and to whom it should be reported. You should submit the instructions to be given to personnel.

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8. License Number 04-15365-01 currently authorizes the use of Gamma Industries Century SA exposure devices. However, these devices are not listed on your renewal application. You should specify whether these devices should be listed on your license when it is renewed.
9. Please indicate the address of each location where radiographic devices may be permanently stored under this license.

We will continue the review of your license renewal request upon receipt of this information. You should submit your response within thirty (30) days from the date of this notice. Please reply in duplicate, and refer to Mail Control No. 17469.

Sincerely,

Beth A. Riedlinger
Health Physicist (Licensing)
Materials Radiation Protection
Inspection and Licensing Section

Enclosure:
Regulatory Guide 10.6