



State of Louisiana

Department of Environmental Quality



M.L. "MIKE" FOSTER, JR.
GOVERNOR

J. DALE GIVENS
SECRETARY

May 3, 1996

The Honorable Shirley Ann Jackson
Chairman
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Chairman Jackson:

Recently, the attached "flyers" have been circulated, indicating that two of the three approved crankout-type of radiographic exposure devices do not meet the horizontal shock test specified in ANSI N432-1980. In addition, the *Teleflex* cable, which is used by all of the manufacturers, will not withstand the torque requirement of Sect. 8.9.2, Endurance Test (Equipment). It is understood that the NRC has taken steps to change a portion of the specification, but in the meantime, the Sealed Source and Device sheets for two of the devices do not mention this shortcoming, and the inference is that all of the devices fully comply with the standard.

As a result of these questions, the Radiation Protection Division has received several phone calls from the regulated community regarding what they are to do. The division has taken the position that since we are not the evaluating agency for those devices, they may continue to be used until such time as the cognizant agencies have reviewed the question and made a determination. Therefore, the division respectfully asks that the NRC (and the State of California) investigate the question raised by the flyers and notify the division of any action that should be taken.

Finally, it is the Radiation Protection Division's strong belief that 10 CFR 34.20, regarding industrial radiographic exposure devices, needs immediate study toward revision, now that the NRC and states have had a chance to see problems which have arisen. Although proper procedures were followed in promulgating these regulations, not everyone had the same understanding of what was being done. This opinion was mentioned at the NRC's Vancouver Technical Workshop, but the division has not heard of any plans to address this issue. The division feels it is time for the NRC and states to review what has been done to see if what was done is what was intended, what the effects have been on the industry and our regulatory staffs and, if necessary, to take appropriate action to correct or clarify any problems created.

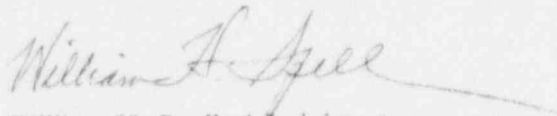
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Thank you for your consideration of this matter. If you have any questions or need additional information, please contact the Radiation Protection Division at the address or phone numbers shown on the previous page.

Very truly yours,



William H. Spell, Administrator
Radiation Protection Division

/whs

Attachments

- c: Commissioners Rogers and Dicus
Office of State Programs, NRC
NRC, Region IV
State of California
All Agreement States
Conference of Radiation Control
Program Directors, Inc.

TEST ALERT

March 20, 1996

INDUSTRIAL NUCLEAR RADIOGRAPHY EXPOSURE DEVICE FAILS ANSI N432-1980 TEST

SPEC COMMISSIONED A NON-PROFIT RESEARCH AND DEVELOPMENT FIRM TO TEST THE INDUSTRIAL NUCLEAR MODEL IR-100 EXPOSURE DEVICE TO VERIFY COMPLIANCE WITH SECTION 8.2 HORIZONTAL SHOCK TEST OF THE ANSI N432-1980 STANDARD. THE TESTS INDICATE THAT THE MODEL IR-100 DOES NOT MEET THIS REQUIREMENT.

TEST ALERT

March 20, 1996

AMERSHAM MODEL 660 RADIOGRAPHY EXPOSURE DEVICE FAILS ANSI N432-1980 TEST

SPEC RECENTLY COMMISSIONED A NON-PROFIT RESEARCH AND DEVELOPMENT FIRM TO TEST THE AMERSHAM MODEL 660A EXPOSURE DEVICE TO VERIFY COMPLIANCE WITH SECTION 8.2 HORIZONTAL SHOCK TEST OF THE ANSI N432-1980 STANDARD. THE TESTS INDICATE THAT THE 660A DOES NOT MEET THIS REQUIREMENT.

TEST UPDATE

March 21, 1996

SPEC-150 RADIOGRAPHY EXPOSURE DEVICE PASSES ANSI N432-1980 TEST

SPEC RECENTLY COMMISSIONED A NON-PROFIT RESEARCH AND DEVELOPMENT FIRM TO TEST THE SPEC MODEL SPEC-150 EXPOSURE DEVICE TO VERIFY COMPLIANCE WITH SECTION 8.2 HORIZONTAL SHOCK TEST OF THE ANSI N432-1980 STANDARD. THE TESTS INDICATE THAT THE SPEC-150 MEETS THIS REQUIREMENT.