

FEB 14 1985

License No: 02-19728-01

Metalogic, A Division of WTL, Inc.,
275 S. Black Canyon Highway
Phoenix, Arizona 85009

Attention: Mr. Jan Buseman
President

Gentlemen:

Subject: NRC Enforcement Conference

This will confirm the telephone conversation between Mr. Dean Lawler of your office, and Mr. R. Thomas of my staff on February 13, 1985, concerning the scheduling of an enforcement conference to be held between NRC management and the management of Metalogic, A Division of WTL, Inc. You should plan to arrive at the NRC Region V Office, 1450 Maria Lane, Walnut Creek, California by 9:00 a.m., on Friday, March 1, 1985. The following matters will be discussed:

1. The violations identified during the inspection at the Hess Refinery, Port Reading, New Jersey on September 5, 1984.
2. NRC enforcement options.
3. NRC concerns.
4. Licensee management responsibilities.

We anticipate that the entire meeting will take approximately two hours.

Sincerely,

/s/

Ross A. Scarano, Director
Division of Radiation Safety
and Safeguards

cc: State of Ariz

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APPENDIX A

NOTICE OF VIOLATION

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275 S. Black Canyon Highway
Phoenix, Arizona 85009

License No. 02-19728-01

As a result of the special inspection conducted on September 5, 1984 and in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violations were identified:

- A. Pursuant to 10 CFR 34.33(a) the licensee shall not permit any individual to act as a radiographer unless, at all times during radiographic operations, such individual wears a film badge or thermoluminescent dosimeter (TLD).

Contrary to the above requirement, a licensee's radiographer working at the Hess Refinery in Port Reading, New Jersey was not wearing a film badge or TLD on August 31, 1984 when he was performing radiography and was exposed to an unshielded radiographic source.

This is a Severity Level IV Violation (Supplement VI).

- B. 10 CFR 34.27, 34.28(b) and 34.43(c) require the licensee to maintain records of utilization, records of inspection and maintenance, and records of radiation surveys respectively.

Contrary to the above requirements, the above required records had not been maintained from August 14, 1984, to September 3, 1984 of radiography performed by the licensee at the Hess Refinery site.

This is a Severity Level IV Violation (Supplement VI).

- C. 10 CFR 20.105(b)(1) and (2) require that no licensee shall use or possess licensed radioactive material in such a manner that unrestricted area radiation levels which, if an individual were continuously present in the area, could result in this receiving a dose in excess of two millirems in any one hour or 100 millirems in seven consecutive days.

Contrary to the above requirements, the licensee's trailer in an unrestricted area contained five radiographic exposure devices which produced radiation levels of 3.0 mrem/hr at the front of the trailer (under an overhang). This area was occupied occasionally by employees during lunch periods.

This is a Severity Level IV Violation (Supplement IV).

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- D. License Condition 17 incorporates by reference the licensee's letter dated June 22, 1981 which enclosed the Radiation Safety and Control Manual. Section 5.1, page 5 of the Manual requires the radiographer to "...have an assistant or someone else notify the Radiation Safety Officer, or Supervisor immediately" in the event of an emergency involving the radioactive source.

Contrary to the above requirement, the radiographer did not notify the Radiation Safety Officer of the potential overexposure event of August 31, 1984, until September 2, 1984.

- E. License Condition 17 incorporates by reference the licensee's letter dated June 22, 1981 which enclosed the Radiation Safety and Control Manual. Section 3.3, page 3 of the Manual requires the radiographer to immediately notify the Radiation Safety Officer if the pocket dosimeter shows an amount of radiation beyond the allowable limits. Also, 10 CFR 34.33(d) requires that the radiographer's film badge shall be immediately sent for processing if the pocket dosimeter is discharged beyond its range.

Contrary to the above requirements, the Radiation Safety Officer was not notified of the radiographer's discharged dosimeter reading until September 2, 1984, and the film badge was not immediately sent for processing.

- F. Licensee Condition 17 incorporates by reference the licensee's letter dated June 22, 1981 which enclosed the Radiation Safety and Control Manual. Section 9.9, page 14.a of the Manual instructs the radiographer to attach the source guide tube to the exposure device.

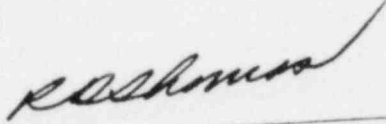
Contrary to the above requirement, the radiographer failed to attach the source guide tube to the exposure device prior to using the device.

Collectively, the above three violations constitute a Severity Level IV Violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Metalogic, A Division of WTL, Inc. is hereby required to submit to this office within thirty days of the date of this Notice, a written statement of explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

APR 12 1985

Dated


R. D. Thomas, Chief
Nuclear Materials Safety Section