

SEP 05 1985

Docket No. 30-20787

License No. 29-21452-01

Consolidated X-Ray Service Corporation
ATTN: Mr. Bruce R. Ballard
Operations Manager
Radiation Safety Officer
6 Woodbridge Avenue
P. O. Box 593
Woodbridge, New Jersey 07095

Gentlemen:

Subject: Inspection Report No. 30-20787/85-01

Your letter dated June 7, 1985, in response to our letter dated May 9, 1985, provided your assessment of the violations of NRC requirements that were identified in our January 4, 1985 inspection.

Thank you for informing us of the corrective and preventive actions with respect to violations B and C as documented in your letter. These actions will be examined during a future inspection of your licensed program.

With regard to Violation A, your June 7 letter contends that there was no violation of the requirements of 10 CFR 34.22(a) because, during radiographic operations on January 4, 1985, the radiographic exposure devices were under the direct surveillance of the radiographer at all times while he was changing film cassettes and that no individual could have entered the restricted area without the knowledge of the radiographer. However, 10 CFR 34.22(a) requires that, during radiographic operations, the sealed source assembly be secured in the shielded position each time the source is returned to that position. The purpose of this requirement is to prevent inadvertent exposure of the source during such operations as film changes. Maintaining surveillance of the device(s) is not an acceptable alternative to more positive actions such as removing the drive cable assembly from the device, inserting the front safety plug, or locking the exposure device. Since the sealed sources were not secured in the two exposure devices following return of the sources to the shielded position at the termination of radiographic exposures, the violation stands as cited.

Accordingly, Consolidated X-Ray Service Corporation is hereby required to submit to this office within thirty days of the date of this letter, a written statement or explanation in reply, including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

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REGION I

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Consolidated X-Ray Service Corporation 2 SEP 05 1985

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:
Thomas T. Martin

Thomas T. Martin, Director
Division of Radiation Safety
and Safeguards

cc:
Public Document Room (PDR)
Nuclear Safety Information Center (NSIC)
State of New Jersey

bcc:
Region I Docket Room (w/concurrences)

Rowe
RI:DRSS
Rowe/fi/mjd

08/27/85

Kinneman
RI:DRSS
Kinneman

08/27/85

Joyner
RI:DRSS
Joyner

08/29/85

Martin
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Martin

08/30/85

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08/22/85