FCLM:JAJ
(97687)

FEB 16 1979

Capitol Steel Corporation
ATTN: Mr. Jess L. Ryan
P.O. Box 26487
Oklahoma City, OK 73126

Gentlemen:

This refers to your application dated December 4, 1978, with which you requested a license for use of sealed sources in radiography.

In order for us to continue our review of your application, we need additional information and clarification concerning the following items:

1. Operating and Emergency Procedures

   a. Your source exchange procedures were very general and included a statement that the radiographers would conduct the source exchanges in accordance with the manufacturer's instructions. This is not an appropriate instruction to the radiographers. Your operating and emergency procedures should be a clear, concise, completely self-contained document that provides the radiographers and radiographers' assistants adequate instructions to perform any licensed operation. It should not be necessary for the radiographers to refer to outside documents for instruction. Therefore, you should revise your procedures to provide complete step-by-step instructions for conducting source exchanges.

   b. You should revise your operating and emergency procedures to include sample copies of all records that the radiographers are required to maintain in the conduct of radiographic operations.

2. Training Program

   a. In your training proram you indicated that you would send your radiography candidates to Gamma Industries or Kodak for their formal classroom training. The Kodak training course has not been evaluated by the NRC as to its acceptability for training individuals in all the items in Appendix A of Part 34. Therefore, you should delete Kodak as one of the schools that you will send your radiography candidates for classroom training.

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b. You did not include copies of your examinations given to determine the competency of individuals to act as radiographers. You should include both a written and a practical examination. The written examination should contain a minimum of 50 questions covering all of the items listed in Appendix A of 10 CFR Part 34.

3. Internal Audits

You indicated in your internal audit program that you would audit the performance of your radiographers and radiographers' assistants on a semiannual basis. We recommend that radiographers and radiographers' assistants be audited at least quarterly to insure they are conducting radiographic operations in accordance with the licensees operating and emergency procedures, license condition, and Commission regulations. Therefore, you should revise your internal audit program to provide audits on a quarterly basis. Your internal audit procedures should also include procedures for reporting deficiencies noted in the audits to higher management and to describe the corrective action that will be taken concerning deficiencies noted.

4. Leak Test Procedures

Your leak test procedures should be revised to include the model number of the leak test kits that will be used in the conduct of leak tests.

Upon receipt of the above information, review of your application will continue. In reply please reference Control No. 97687.

Sincerely,

James A. Jones
License Management Branch
Division of Fuel Cycle and
Material Safety

OFFICE	FCLM					
SURNAME	JAJones:bjp					
DATE	2/16/79					