DEC 8 1980

FCMLB:[redacted]
030-06589
(04401)

Met Lab, Inc.
ATTN: O. W. Ward, III
605 Rotary Street
Hampton, VA 23661

Gentlemen:

This letter refers to your application dated May 23, 1980, for renewal of License No. 45-09963-01. Additional information is needed to support your application.

To assist you in providing this information, we have enclosed a copy of Regulatory Guide 10.6, Revision 1, Guide for the Preparation of Applications for Use of Sealed Sources and Devices for Performing Industrial Radiography. You should refer to this guide and provide additional information in the following areas:

1. Personnel Monitoring. Paragraph 34.33(c) of 10 CFR Part 34 requires that pocket dosimeters be checked at yearly intervals to ensure that the dosimeters respond to within 30 percent of true radiation exposure. Our review of your application did not find any reference to dosimeter radiation checks. You should therefore submit your procedures for checking dosimeter radiation exposure and energy response. Refer to Item 6(d) of the enclosed guide.

2. Operating and Emergency Procedures. Section 34.32 of 10 CFR Part 34 requires that you include the following instructions in your operating and emergency procedures:

   a. Use of devices. Our review of your application finds that you have not included in your operating and emergency procedures specific instructions in the use of each type of exposure device. In addition, our review finds no reference to source changing in your procedures for radiographers. If radiography personnel will perform this function, you must provide clear instruction in handling and changing the sources, and the radiation safety procedures to be followed. If radiographers will not perform this function, you should specify the individual who will. You should refer to Appendix B, Item a of the enclosed guide and submit revised procedures.

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b. Methods and occasions for conducting surveys. Our review of your operating and emergency procedures finds no specific reference to surveying the storage area. You should provide instructions in your procedures for surveying the storage area where the radiography device will be kept to ensure that radiation levels for unrestricted areas are not exceeded. Secondly, Section 7.3.0 of your operating and emergency procedures requires that radiographers survey the high radiation area to ensure that the limits specified for that area are not exceeded. Since such surveys may needlessly expose the radiographer to excessive radiation, radiographers should only post the high radiation area and not make a survey. Surveys of the boundary for unrestricted areas must still be made. Finally, your application does not specifically require a radiographer to measure the radiation levels around the exposure device's shipping container to ensure that DOT regulations are met. You should refer to Appendix B, Item b of the enclosed guide, and submit the information requested.

c. Controlling access. Section 3.7.1 states that the high radiation [redacted] shall be kept under visual surveillance at all times. One can infer that no other part of the restricted area need be kept under surveillance. To avoid radiographer confusion, you should provide a specific instruction in controlling access to all restricted areas. You should refer to Appendix B, Item c of the enclosed guide.

d. Transporting sealed sources. During transportation, exposure devices must be secured within the transporting vehicle to prevent shifting. Your operating and emergency procedures do not provide any instruction in this area. Therefore, you should revise your procedures to include instructions in the method for securing devices against shifting in the transporting vehicles. Please refer to Appendix B, Item f of the enclosed guide, and submit a copy of the revised procedure to us.

e. Inspection and maintenance. Our review of your application finds that you have not provided sufficient information to permit us to determine if your inspection and maintenance program meets the minimum criteria. You should refer to Appendix B, Item j of the enclosed guide, and submit the appropriate procedures.

f. Product defects. Our review of your application finds insufficient information about the instructions that you will give radiographers in reporting device defects as required by 10 CFR Part 21. You should refer to Appendix B, Item l, and submit the information requested.

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3. Training Program. Our review of your application finds that you have failed to submit your program of instructions to radiographers, radiographer assistants, and radiographer trainees. You should refer to Item 6(f), and Appendix C of the enclosed guide, and submit your training program.

4. Internal Inspection System. Our review of your application finds insufficient information to permit us to determine if your internal inspection system meets our minimum criteria. You should refer to Item 6(g) of the enclosed guide, and resubmit your description of your internal inspection system.

We will continue our review of your application upon receipt of the requested information. Please reply in duplicate, and reference Mail Control No. 04401.

Sincerely,

[redacted]

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

Enclosures:
1. Regulatory Guide 10.6
   Revision 1
2. 10 CFR Part 34

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