



Magnaglo and Electronic Inspection

- Elk City, Okla.  
- Oklahoma City, Okla.

P.O. Box 944

Elk City, Okla. 73644

July 25, 1988

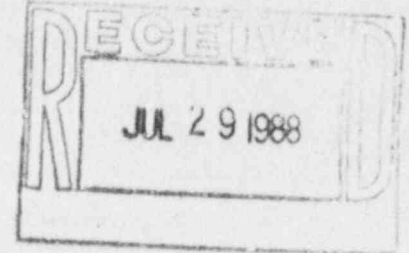
Casing • Tubing • Cleaning & Drifting

Docket: 30-19464/88-01

License: 35-19884-01

U.S. Nuclear Regulatory Commission - Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Attn: Mr. William L. Fisher, Chief  
Nuclear Materials Safety Branch



Re: NRC Inspection on 6/9/88 Conducted by Mr. A.D. Gaines

Gentlemen:

We acknowledge receipt of your letter of June 27, 1988, and the accompanying Notice of Violation, which was generated as a result of an inspection of our operations as they pertain to the above numbered license. We respond to the Notice of Violation by item as follows:

1. This violation resulted from moving occupants from office to office and remodeling. The files containing these records had been moved, but were on the premises. Evidently, the notice describing the documents and where they could be examined was removed and not replaced. Subsequent to the inspection, copies of all the referenced documents were compiled together in a binder for the Oklahoma City office and the Elk City office. Notice of where these documents can be examined was added to the posted Form NRC-3. Full compliance was achieved on June 17, 1988.

2. The reason for this violation is the same as that in Item #1. Mr. Gaines brought this to our attention during the inspection, and Form NRC-3 "Notice to Employees" was posted in the Elk City office and the Oklahoma City shop on that date. Full compliance was achieved on June 9, 1988.

3. We contest this violation which specifies, "...the records did not contain doses for the personnel for whom such monitoring was required...." A review of the dosimetry reports from Landauer for the period of time indicated, reflects "M" for minimal as the dose received. This is the usual dose for operators of pipe inspection equipment. In fact, NDT Systems' data sheet from the State of Texas (copy attached) indicates that personnel monitoring is not required. We have elected to provide this service in order to inform our personnel of their exposure and for protection from legal liabilities which could surface in future years. The exposure reports indicate that control badges were not sent in with the appropriate badges. Evidently Joseph Mora, who was the only operator for the past 2+ years, lost a control badge or got them mixed up, putting the control badges out of sequence. This does not significantly affect the reports due to the fact that reports have always shown the exposure on the control badge to be "M", or minimal. During this period of time we have had only two units available for use (two others are in storage). The only employee who operated the units was Joseph Mora with only one or two jobs per month. He was provided a badge and each badge was sent for analysis, and we have no reason to believe he received any more than a minimal dose as indicated on the reports.

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Page Two  
U.S. NRC - Region IV  
July 25, 1988

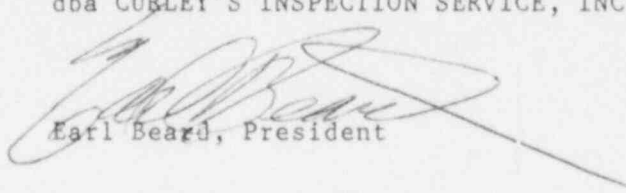
4.(a) According to personnel records, Fonny D. Spears left our employment on or about 8/15/85. At that time I instructed our secretary to contact our consultant and have an amendment request prepared to name Joseph Mora as RSO. Mr. Mora assumed the duties of the RSO and until the inspection I was under the assumption that the amendment had been issued. Mr. Mora advises that he gave my secretary copies of his radiation safety training certificates and resume information and he thought the amendment had been taken care of. She is no longer in our employ, and Mr. Mora has been off work due to injury for most of the past six months, and probably will not return to work for us. In order to correct this violation, we have prepared and are submitting to the NRC Region IV office a request for amendment to our license naming another individual as RSO. Full compliance will be achieved upon receipt of the amendment, which we assume will be within the next 30 days.

4.(b) Survey meters were not calibrated at six months intervals because the calibration service company indicated 12 months intervals on the sticker on the meter. We have contacted Ludlum Measurements, Inc. and requested that they put our meters on a 6 months cycle. Dates for future calibrations to meet the 6 months interval have been written on our office calendar so the RSO will be reminded to send them for calibration. We feel we are now in full compliance.

We trust that the information in this response will satisfy your request. Basically, the steps which will be taken to avoid further violations, if not specifically addressed in the items above, is better coordination and communications between management and the RSO of actions needed to ensure compliance. Our new secretary, Jane Smith, is aware of the requirements of our license and will work as a liaison between myself and our new RSO, Tony J. Mora. I do not believe these violations would have occurred if our industry was economically stable. The depression in the oil and gas industry has caused our business to decrease almost to a standstill and lack of activity causes lax attitudes and employee turnovers, resulting in failed communications. Our new RSO has the required experience and training, and I have impressed upon him that this responsibility cannot be taken lightly.

Sincerely,

Apache Inspection Service, Inc.  
dba CUBLEY'S INSPECTION SERVICE, INC., No.102



Earl Beard, President

pm  
Enclosures

cc: Support Consultants

#### RADIATION SAFETY INSTRUCTIONS:

The manufacturer provides, prior to delivery or at the time of delivery, a field test of the equipment which serves as an operator training period for the buyer and insures that the buyer understands the "Operational Procedures" and the mechanics of the system. The manufacturer also offers a radiation training course to those who are unfamiliar with the basics of radiation monitoring and safety. Repair and maintenance work involving the source or source mechanism is performed by Nuclear Sources and Services, Inc. of Houston, Texas.

#### LICENSING

Because the low levels of radiation, the State of Texas does not require personnel monitoring for operators of the device. A survey meter is required, however, for making surveys and to check the source holder prior to shipment, etc. Leak tests are required every six months. The manufacturer can provide an approved leak test kit and furnishes instructions for leak testing.

Texas Department of Health

September 1977

O F F I C I A L   U S E   O N L Y

Note to NRC: This is from the NDT Systems Inc. User's Manual which is included in our Radiation Safety Procedures Manual.