



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-8064

November 17, 1997

Bill R. Fraser  
President  
High Mountain Inspection Services, Inc.  
P.O. Box 1508  
Mills, Wyoming 82644

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-33887/97-01

Dear Mr. Fraser:

Thank you for your letter of November 11, 1997, in response to our letter and Notice of Violation dated August 11, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. In regards to your comments concerning radiography devices being considered in transport while parked at your Evanston, Wyoming address, please note that 10 CFR 34.3 defines "field station" as a facility where licensed material may be stored or used and from which equipment is dispatched. It is our understanding that equipment was dispatched from the Evanston location and thus is considered a field station. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

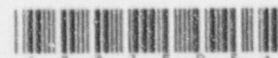
Sincerely,

D. Blair Spitzberg, Ph.D., Chief  
Nuclear Materials Inspection and  
Fuel Cycle/Decommissioning Branch

Docket No.: 030-32202  
License No.: 11-27316-01

cc w/copy of licensee ltr dtd 11/11/97:  
Wyoming Radiation Control Program Director

9711210122 971117  
PDR ADDCK 03033887  
C PDR



bcc w/copy of licensee's ltr dtd 11/11/97 to DCD (IE07)

bcc w/copy of licensee's ltr dtd 11/11/97 distrib. by RIV:

RIV Regional Administrator

RAScarano

LLHowell

MRShaffer

DBSpitzberg

FAWenslawski

RABrown

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RIV Nuclear Materials File - 5th Floor

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HIGH MOUNTAIN INSPECTION SERVICES, INC.

IE07

TEL. (307) 266-4966

P.O. Box 1508  
Mills, WY 82644

November 11, 1997

VIA: FedEx

Mr. Robert A. Brown  
U. S. Nuclear Regulatory Commission, Region IV  
Nuclear Materials Licensing Section  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Dear Mr. Brown:

RE: Notice of Violation Docket No. 030-33887  
License No. 49-26808-02

Enclosure 1 Notice of Violation dated August 11, 1997  
stated:

10 CFR 30.34(c) requires, in part, that each licensee confine his possession and use of byproduct materials to the location and purposes authorized by the licensee.

Condition 11 of License No. 49-26808-02 requires that licensed material be used only at 1581 Derrick Drive, Casper, Wyoming and at temporary job sites.

Contrary to the above, from later April 1997 to the date of the inspection, the licensee possessed and used radiographic devices containing iridium-192 at a non-temporary job site at 91 Allegiance Circle, Evanston, Wyoming, a location not authorized by the licensee.

High Mountain Inspection Service, Inc. did park vehicles at the above stated address containing iridium-192 industrial radiography devices which were properly packaged, marked and labeled for transportation in accordance with applicable requirements. These devices were considered in transportation between temporary job-site locations, in the same manner as if the radiography vehicle with a camera had been parked at a hotel or motel which is typical for radiography operations. The devices were not "used" at the 91 Allegiance Circle, Evanston, Wyoming address in the sense that no radiography has ever been performed at the address.

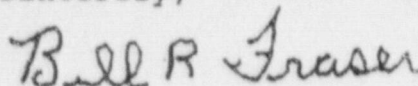
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Mr. Robert A. Brown  
November 11, 1997  
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The language in the second paragraph of Section V on page 28962 of the May 28, 1997 Federal Register tends to lead one to believe that the requirements in this particular area are not clear.

High Mountain Inspection Service, Inc. does not challenge the violation, and is filing concurrently with this letter a license amendment incorporating the Evanston, Wyoming branch office address. The license amendment has been delayed because the amendment is extensive and attempts to update the High Mountain Inspection Service, Inc. license application so that it conforms to the newly publish industrial radiography requirements on May 28, 1997; and because our consultant has been back logged and has had personal family problems.

Sincerely,

A handwritten signature in cursive script that reads "Bill R. Fraser". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Bill R. Fraser  
President