

Results: In the areas inspected, 11 apparent violations were identified: failure to maintain surveillance of a high radiation area (paragraph 4.A); failure to perform an adequate survey of a radiographic exposure device (paragraph 4.B); failure to recharge pocket dosimeter prior to the start of a shift (paragraph 4.A); failure to survey/evaluate the whole body exposures of non-licensee personnel and the extremity exposures of radiographers who performed source retrieval (paragraph 4.A); failure to notify RSO in the case of an accident/emergency (paragraph 4.A); attempting a source retrieval without the consent and direction required by procedures (paragraph 4.A); failure to secure sealed source in the shielded position (paragraph 4.B); failure to survey/evaluate the radiation levels in an unrestricted area (paragraph 5); exceeding 2 mR in an hour in an unrestricted area (paragraph 5); failure to grade a qualification exam prior to allowing an individual to perform radiography (paragraph 7); and shipping papers not containing all of the required information or containing erroneous information (paragraph 13).

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records indicated that the record of the daily equipment inspection for January 31, 1985, had been received. However, the licensee was unable to locate the record. No additional occurrences of this situation were identified by the inspectors.

(Open) Inspection 84-02: unqualified personnel performing the duties of a radiographer. The licensee informed the RSOs that approval of radiographers may be expedited by transmitting test results from the RSC to the RSOs via the telephone, but under no circumstances are radiographic personnel to be permitted to perform the functions of a radiographer without proper training and certification. The inspectors reviewed training records for radiographic personnel and found an additional example of an individual performing the duties of a radiographer prior to completion of the required certification (paragraph 7).

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(Closed) Inspection 84-02: failure to maintain a utilization log for a day in which radiography was performed. The licensee clearly defined to the radiographers the individual responsible for assuring all paperwork was completed. The inspectors reviewed a representative sample of utilization records dating back to the last inspection and no further violations were identified.

(Closed) Inspection 84-02: failure to maintain a record of quarterly physical inventory. The RSC sent reminders to the RSOs in the Regional Districts concerning their quarterly duties (e.g., perform physical inventory). The inspectors reviewed a representative sample of quarterly physical inventories and no further violations were identified.

(Closed) Inspection 84-02: failure to maintain a record of the final survey performed on a radiographic exposure device at the end of the shift. The licensee clearly defined to the radiographers the individual responsible for assuring all paperwork was completed. The inspectors reviewed the records of the final survey of the radiographic exposure devices and no further violations were identified.

### 3. Scope of Operations

Pittsburgh Testing Laboratory (PTL) is licensed by the NRC to perform radiography at fixed and field sites in non-Agreement States and on off-shore drilling platforms in the Gulf of Mexico. Nine permanent storage locations and two temporary storage locations are authorized. The company is also licensed in several Agreement States.

The corporate headquarters is located in Pittsburgh, Pennsylvania. The licensee has eight permanent radiographic cells located in areas where the NRC maintains jurisdiction; three of those cells are located at the Pittsburgh facility. Radiation Safety Officers located at the permanent storage locations report to the Corporate Radiation Safety Coordinator.

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by Radiographers A and B (Paragraph 4.A) on January 31, 1985. The inspectors asked Radiographer A if he had performed an inspection of the radiographic equipment on that day. He stated that he had performed the inspection. The Radiation records Department in the Pittsburgh Office maintained a tracking system for the receipt of required documents and their records indicated that the record of the daily equipment inspection for January 31, 1985, had been received. However, the licensee was unable to locate the record.

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The results of quarterly equipment inspection and maintenance are documented by the licensee. The inspectors reviewed records dating back to the last inspection of quarterly maintenance and inspection. No apparent violations were identified.

9. Utilization Log and Quarterly Inventory

The inspectors reviewed records of quarterly physical inventories documented in accordance with 10 CFR 34.26. They also reviewed a representative sample of utilization records dating back to the last inspection.

No violations were identified.

10. Uses of Materials, Facilities and Equipment

The inspectors reviewed records of survey meter calibrations. Survey meters used in performing radiography had all been calibrated within three months prior to their use. The inspectors tested the audible/visible alarms at the three cells in Pittsburgh and at the cell in Sharon Hill, Pennsylvania, (Philadelphia office). All were operating properly. All radiographic exposure devices observed by the inspectors at the Pittsburgh/Philadelphia Offices and at the field site in W. Elizabeth, Pennsylvania, were adequately secured.

No apparent violations were identified.

11. Leak Tests

The inspectors reviewed a representative sample of the records of leak-tests performed on sealed sources in exposure devices.

No violations were identified.

12. Receiving of Material

The inspectors reviewed a representative sample of the records of the surveys performed on incoming packages containing radioactive material.

No violations were identified.

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