

July 17, 1986

United States Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, TX 76011

Gentlemen:

License:

35-23191-01

Docket: 30-28806/86/01

The following is a response to your letter of June 26, 1986, regarding the safety inspection conducted by Mr. Lorenzo Wilborn on May 30, 1986.

The following responses correspond to the item numbers listed on the "APPENDIX NOTICE OF VIOLATION" attached to the above-referenced letter.

Item 1. a. Item 6 of the letter received September 9, 1985, requires, in part, that personnel monitoring be accomplished by thermoluminescent dosimeters (TLD) exchanged quarterly.

> Personnel monitoring is being provided, which will be kept in force indefinitely.

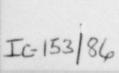
b. Item IV.B.5. of the license application requires in part, that a source holder radiation profile be taken when a source is received and recorded on the radiation profile form.

A current profile of source holder has been made and put on file. Profiles will be made at six months.

c. Item II.A.3. of the license application requires, in part, that records of results of all radiation surveys be maintained in the radiation file.

All area surveys are and will be taken in the future; and records will be maintained and kept in the proper order.

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Item 2. a. 49 CFR 172.200(a) requires, in part, that each person who offers a hazardous material for transportation describe the hazardous material on the shipping paper.

The proper shipping forms have been obtained and will be properly completed before the material is shipped from our storage yard on state and/or public roads.

b. 49 CFR 172.403(a) requires, in part, that each package of radioactive material be labeled as provided in Section 172.403 (c).

The proper Yellow II labels have been obtained and are in place on the material containers.

c. 49 CFR 173.415(a) requires, in part, that each shipper of a specification 7A package maintain performance test records on file for at least one year after the latest shipment.

We are presently waiting for a copy of the performance test of the Class A container for the manufacturer. We should have it approximately August 1, 1986, at which time we will advise.

d. 49 CFR 173.476(a) requires, in part, that each shipper of special form radioactive materials maintain performance test records for each source design on file for at least one year after the latest shipment.

We have received the performance test record for the CS 137 source desium from Gulf Nuclear Inc., the manufacturer of the source. Nuclear Regulatory Commission Page 3 July 17, 1986

Item 3. 10 CFR 19.11(a) or (b) and (c) requires, in part, that each licensee post current copies of specified regulations, the license and all documents incorporated into the license by reference and amendments thereto, and the operating procedures applicable to licensed activities or a notice describing the documents and specifying where they may be examined, and NRC Form 3.

NRC Form 3 and supplement notice has been posted in the public traffic areas of our shop, where it is visible by our employees and/or traffic through the place of employment and also has been posted in the operator compartment of the unit.

Item 7. Change Item No. 7 to read that Rick A. Delno be deleted from our user license.

Steps to be taken in the future to avoid future violations after each job which is performed:

A check list is to be set up to ensure all proper forms have been completed and filed in the proper order.

All records will be reviewed on a timely basis to ensure up-to-date records.

The equipment in question will be stored at the company yard and securely locked at all times to ensure unauthorized use.

The equipment will be checked approximately once a month to ensure that there has not been unauthorized entrance to the unit.

There will be a servicing of equipment when it is not used for an extended period of time to ensure that it is still securely locked at all times.

Sincerely,

Clinton A. Delno Safety Officer

President