



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

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

March 11, 1998

Ken Head, President
H&H X-Ray Services, Inc.
P.O. Drawer 517
West Monroe, Louisiana 71294-0517

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-17191/97-01 AND NOTICE OF VIOLATION

Dear Mr. Head:

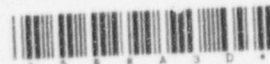
Thank you for your letter of February 26, 1998, in response to our letter and Notice of Violation dated February 2, 1998. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

for D. Blair Spitzberg, Chief
Nuclear Materials Safety Branch 2

Docket No.: 030-17191
License No.: 17-19236-01

cc w/copy of licensee's ltr dtd 2/26/98:
Louisiana Radiation Control Program Director
Oklahoma Radiation Control Program Director



120077

9803120350 980311
PDR ADOCK 03017191
C PDR

E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD w/copy of licensee's ltr dtd 2/26/98: (IE07)

bcc distrib. by RIV w/copy of licensee's ltr dtd 2/26/98:

Regional Administrator

LLHowell

DBSpitzberg

CLCain

JCruz

NMSB2

MIS System

RIV Nuclear Materials File - 5th Floor

DOCUMENT NAME: G:\NMIS.O\JC\817191A.JXC

To receive copy of document, indicate in box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

RIV-DNMS:NMSB2	C:NMSB2						
JCruz:sws <i>JC</i>	DBSpitzberg <i>DB</i>						
3/10/98	3/11/98						

OFFICIAL RECORD COPY

E-Mail report to Document Control Desk (DOCDESK)

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RIV Nuclear Materials File - 5th Floor

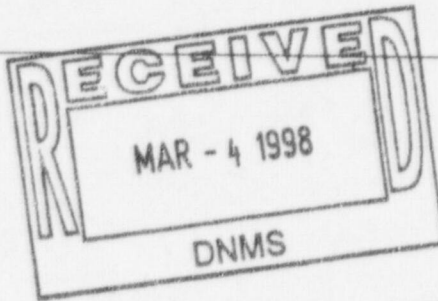
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RIV:DNMS:NMSB2	C:NMSB2								
JCruz: wsw <i>JC</i>	DBSpitzberg <i>DBS</i>								
3/10/98	3/11/98								

OFFICIAL RECORD COPY

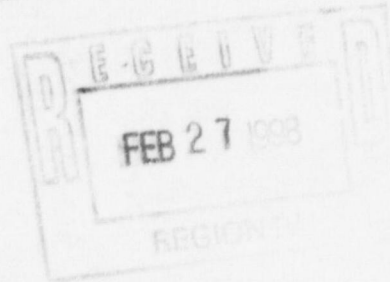
H & H X-Ray Services Inc.



P.O. Box 517
West Monroe, LA 71294-0517
(800) 551-5083
Fax: (318) 398-0767

February 26, 1998

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555



RE: Reply to a Notice of Violation

Gentlemen:

In response to the Notice of Violation received from your office dated February 2, 1998, we submit the following.

Violation 1 (Failure to secure licensed material)

See attachment for root causes and corrective actions taken.

Compliance was met immediately.

Violation 2 (Removal of Radioactive Material labeling)

A description of the violation is contained in the attachment as well as corrective actions. We have also discussed this with our other RSOs and explained the requirements.

Compliance met immediately.

Violation 3 (submitting of 1996 annual report)

This was an oversight on my part and the reports will be sent immediately. Reports for 1997 will be sent as soon as we receive them from our Film Badge supplier.


Compliance met immediately.

98-0863

9803030363 4pp.

If I can be of any further assistance please call at 1-800-551-5093.

Sincerely,

A handwritten signature in cursive script that reads "Ken Head". The signature is written in dark ink and is positioned below the word "Sincerely,".

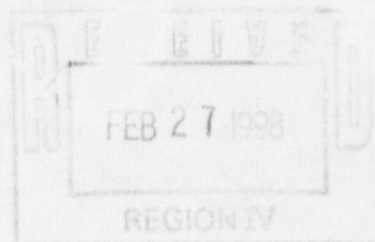
Ken Head
RSO

H & H X-Ray Services Inc.



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(800) 551-5063
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Ken Head
Corporate RSO
H & H X-Ray Services Inc.
P.O. Box 517
West Monroe, LA 71294



December 1, 1997

Radiation Safety Officers

RE: Oklahoma Incident

As you probably know, we had a incident in Oklahoma where a Gamma Century camera was found in a storage vault after the manager moved. Upon reviewing the information and talking to the people involved, we have comprised the following list of conditions that led to this incident and steps to be taken to ensure that this never happens again.

Conditions :

1. Management, including myself, has neglected these old cameras and not ensured that they be carried on quarterly inventories. This has been going on for an extended period of time since I have yet to find a inventory which includes one of these empty cameras since they were taken out of service. The thought has been that they were for source vault shielding and emergency use only and not required to be carried on inventories. This mind set has been further reinforced by the fact that no regulatory agency has paid any attention to the cameras when doing inspections. Had the camera been carried on the inventory this would not have happened.
2. The manager has stated that he got in a rush to get moved. Although we can find no reasoning for this, after taking three weeks to move, it might partly explain why the building was left so cluttered with debris upon his moving. Had decent housekeeping been employed the camera would have been discovered.
3. The source vault was left unlocked upon leaving. Although the manager thought the vault contained no radioactive material, there were still many shipping cans labeled as radioactive. These should have been locked up until they could have been properly disposed of.

Corrective actions to be taken immediately:

1. All cameras loaded or not will be carried on inventories.
2. All offices will practice good house keeping around source vault areas. Any boxes, crates, or other material not usable will be discarded after removing all radioactive labeling.

98-0863

Radiation Safety Officers

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December 1, 1997

3. Upon moving, closing, or changing management at a storage location, this office will send a representative to ensure all proper requirements are met and all devices are checked against inventories.

4. **NO** boxes, crates, or any other material with Radioactive labeling will be left unsecured.

Please keep one copy of this and return one copy to the office signed.

Sincerely,



Ken Head
Corporate RSO

Received by: _____

Location: _____