

22 APR 1987

License No. 37-17507-01  
Docket No. 030-12859  
Control No. 106032

Duquesne Light Co.  
ATTN: Aldo F. Mosso, RSO  
P. O. Box 184  
Shippingport, Pennsylvania 15077

Gentlemen:

This is in reference to your application dated August 14, 1986 to renew License No. 37-17507-01. In order to continue our review, we need the following additional information:

1. We note that your description of training requirements for radiographers and their assistants and for previously experienced radiographers does not mention a practical exam, however, your Radiation Safety Manual includes a practical exam sample evaluation data sheet for assistant radiographers and radiographers. In your manual you refer to this as training. Please confirm that a practical exam will be required for each category of certification.
2. Your description of training appears to permit previously trained radiography personnel to have on the job training prior to formal operating and emergency procedure training, training in use of the equipment, a practical exam, and a written exam. NRC expects this training to be formal and not in the process of performing work. The on the job training is a good idea after the individual meets the basic training criteria. Please confirm that previously trained radiographers will not be trained on the job until meeting the minimum requirements of training for assistant radiographers.
3. Please confirm that radiographic exposure devices will not be chained or locked to a structure at a field site where unauthorized personnel could have access to the device. NRC expects radiographic devices to be secured inside a locked storage area and secure from unauthorized personnel unless the radiographer is physically present to maintain surveillance.
4. Please confirm that a radiographer will complete a utilization log each day before reporting to a field site. Utilization logs must contain all the information required by 10 CFR 34.27.
5. Please confirm that when transporting radiographic sources that you will comply with all of the Department of Transportation regulations regarding marking, labeling, securing and completing of the shipping papers.

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6. Your program for quarterly inspections of radiographers and their assistants should consist of unannounced field site inspections performed on each radiographer and assistant within each 1 quarter year and that if a radiographer cannot be audited within a quarter he must be audited on his first work assignment within the next quarter. Please confirm that your program will include such an audit and describe your program including the audit record that you will maintain. The information provided in your application does not provide sufficient details.
7. Please describe your daily inspection procedure of radiographic cameras and equipment. What record will you maintain? Please also include in your quarterly maintenance a procedure to remove the entire control cable from its housing to check for wear.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 106032.

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

Sincerely,

Original Signed By:  
Thomas K. Thompson

Thomas K. Thompson  
Nuclear Materials Safety Section B  
Division of Radiation Safety  
and Safeguards

*TKT*  
RI:DRSS  
Thompson/k1

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