

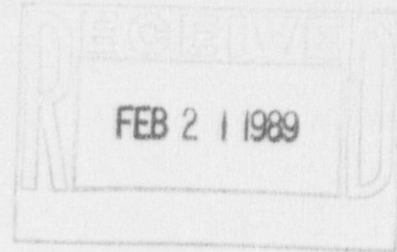


HOUSTON INSPECTION, INC.

12300 ZAVALLA STREET • HOUSTON, TEXAS • 77085 • 713/729-2900

February 16, 1989

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



Attention: Mr. Jack Whitten
Nuclear Materials Licensing Section

SUBJECT: Requested Amendments and Clarifications to License Application
Control Number 462238

Gentlemen:

Additional information requested by telephone on February 14, 1989, is
furnished as follows:

9. FIELD PRACTICAL EXAMINATION, Page 8-1, Item II, Subpart C. Page 8-1(A)
has been completed as an amendment to this section to explain what will
be covered by the Radiation Safety Officer in the Field Practical
Examination.
18. and 19. Transportation of Radioactive Materials, Item F, Page F-1 and
F-2, Sub part 3.a. and 3.b.. New amended pages have been completed
to include O & E instructions to personnel on labels and placards.

Please contact us if additional information is required.

Sincerely,

Gene Waltman
Vice President

/rlb

Attachments

8903170238 890227
REG4 LIC30
42-26962-01 PNU

462238

F. TRANSPORTING SEALED SOURCES

1. Transportation and/or Storage of Isotopes in Company Vehicles

- a. The source in its device shall be secured inside the approved storage box built into the truck.
- b. The transporting vehicle must be clearly marked with the word "Radioactive" on all four sides.
- c. The outer surface of the vehicle shall be surveyed with a survey meter to assure that the radiation levels do not exceed 2 mR/hr.
- d. A survey of the passenger compartment shall be made to assure that the radiation levels do not exceed 2 mR/hr in the cab area.
- e. Results of these surveys shall be recorded on job-site sheet.

2. "Cobalt 60" Trailer Sole Use Vehicle

INSTRUCTIONS TO DRIVER:

- a. Provisions must be made to secure the device so that its position within the trailer remains fixed during transportation.
- b. There will be no loading or unloading operations between the beginning and end of the transportation.
- c. Radiation levels may not exceed 200 millirem per hour at any point on the outer surface of the trailer.
- d. Radiation levels may not exceed 10 millirem per hour at any point two meters from the trailer.
- e. Radiation levels may not exceed 2 millirem per hour in any normally occupied position in the vehicle.
- f. In case of vehicle failure or accident, do not leave the trailer unattended.

3. Placards on Vehicles and Packages

- a. Vehicles used on job sites to transport radioactive materials will be placarded at all times, as required under 49 CFR 172.519 and 49 CFR 172.556, and 49 CFR Appendix B., as follows:
 - (1.) When a yellow III package is aboard, radioactive placards will be placed on all four sides of vehicle.
 - (2.) When a Yellow II or White I package is aboard placards are not required.
 - (3.) Radioactive placards must have the top portion yellow with the symbol black. The bottom portion must be white with the inscription black.
 - (4.) All placards used will be of specified size, configuration and colors.
- b. Packages and containers for radioactive materials will be labeled as required under 49CFR 172.403.
 - (1.) Radioactive White I, when maximum dose rate at surface of package does not exceed 0.5 mR/hr.
 - (2.) Radioactive yellow II, when maximum dose rate at surface of package does not exceed 50 mR/hr., and maximum dose rate three feet from package does not exceed 1 mR/hr.

- (3.) Radioactive yellow III, when maximum dose rate at surface of package exceeds 50 mr/hr., or dose rate at three feet exceeds 1 mr/hr.

4. Securing Exposure Devices

- a. Exposure devices will be transported in approved packaging and storage containers. Containers will be of the approved type, utilizing lock rings to seal container. Container will be secured in the vehicle transport area to prevent any movement during transport. Outer door of storage area of transport vehicle will be locked.

5. Vehicle Radiation Precautions

- a. Any time that a reading in the cab area of the transport vehicle exceeds the 2 mr/hr level, the storage container must be repositioned or additional shielding added in order to bring the affected area back within the limits required.

P. 8-1-(A), 8.2.(C)

9. FIELD PRACTICAL EXAMINATION

The Radiation Safety Officer will conduct a field practical examination of prospective radiographers. This practical demonstration of the radiographer's knowledge and ability will cover a minimum of the following areas. A minimum passing is 70%.

FIELD PRACTICAL EXAMINATION

1. Removal and return of radiography device from storage area.
 - a. Utilization log
 - b. Device survey
 - c. device labeling

10%
2. Transporting radiography device to job site.
 - a. Securing device
 - b. Vehicle survey
 - c. Vehicle placards

10%
3. Safety equipment present.
 - a. Fire extinguisher
 - b. Film badge
 - c. Pocket dosimeter
 - d. O & E Manual
 - e. Survey meter

15%
4. Area Survey and control at jobsite
 - a. Radiation warning signs and barriers
 - b. Monitoring of restricted area
 - c. Survey of restricted area
 - d. Calculating time/distance/shielding required

15%
5. Radiography operations
 - a. Survey radiography device
 - b. Lock-out survey after each exposure
 - c. Precautions against unauthorized access to source

10%
6. Record keeping
 - a. Pocket dosimeter reading
 - b. Recording all job site surveys
 - c. Recording all vehicle surveys

10%
7. Safe equipment operations
 - a. Checking lock box, drive cable, guide tube
 - b. Positioning of crank-out cables and guide tube
 - c. Replacing dust cover, safety plug
 - d. Lock-out survey completed

10%
8. General safety conditions
 - a. Surveillance of area before beginning radiography operations
 - b. Insuring proper signs are posted on perimeter of restricted area
 - c. Constant monitoring of area to restrict unauthorized personnel
 - d. Use of required personal safety equipment, other than personal monitoring devices

10%
9. General understanding of emergency procedures
 - a. Job site safety and reporting of unshielded source
 - b. Area safety and reporting of accidents in vehicles while transporting source

10%

462238

2/14



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
811 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76011

Jack -

Please take note of
these before you
issue the license.

AKC

In Reply Refer To:
License: 42-23150-01
Docket: 30-20313/89-01

Houston Inspection Laboratories, Inc.
ATTN: Jimmy Montgomery, Owner
12300 Zavalla Road
Houston, Texas 77085

Gentlemen:

This refers to the routine, announced radiation safety inspection conducted by Dr. D. B. Spitzberg and Ms. L. L. Kasner of this office on January 11, 1989, of the activities authorized by NRC Byproduct Material License 42-23150-01 and to the discussion of our findings held by the inspectors with members of your staff at the conclusion of the inspection.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations, and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the inspectors.

During this inspection certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter in writing in accordance with the provisions of Section 2.201 of the NRC "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The inspectors also reviewed the action you had taken with respect to two violations observed during our previous inspection, which was conducted February 11, 1987. One of the violations was determined to have recurred since the previous inspection. This item is identified as Violation 3 in the attached Notice. Your response to the Notice should specifically discuss the management controls that you are implementing to preclude similar occurrences of repeat violations.

The response directed by this letter and accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

~~8902230001~~ 2pp

Houston Inspection Laboratories, Inc. -2-

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Charles L. Cain *for*

William L. Fisher, Chief
Nuclear Materials Safety Branch

Enclosure:
Appendix - Notice of Violation

cc:
Texas Radiation Control Program Director

APPENDIX

NOTICE OF VIOLATION

Houston Inspection Laboratories, Inc.
Houston, Texas

Docket: 30-20313/89-01
License: 42-23150-01

During an NRC inspection conducted on January 11, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

1. License Condition 17 requires, in part, that the licensee possess and use licensed material in accordance with statements, representations, and procedures contained in application dated August 30, 1984, and letter dated October 2, 1984.

- a. Item 7 of the license application dated August 30, 1984, specifies a certain individual by name as the Radiation Safety Officer (RSO).

Contrary to the above, on January 11, 1989, the NRC inspectors determined that during February 1987 the named individual who had served as the RSO left the licensee's employment and had been replaced with an individual not authorized by the NRC to serve as RSO. The individual appeared qualified but had not been through the NRC review process.

This is a Severity Level IV violation. (Supplement VI)

- b. Item 14.5 Section III of the Operating and Emergency Procedures contained in the license application requires, in part, that records of quarterly field inspections performed on each radiographer shall be maintained by the RSO.

Contrary to the above, on January 11, 1989, the licensee could not locate the records of quarterly field audits purportedly performed as required on seven radiography personnel who had worked in areas under NRC jurisdiction since the previous NRC inspection on February 11, 1987.

This is a Severity Level V violation. (Supplement VI)

2. 10 CFR 34.24 requires that each survey instrument used to conduct physical radiation surveys be calibrated at intervals not to exceed three months and after each instrument servicing.

Contrary to the above, on January 11, 1989, the NRC inspectors determined that from August 20-25, 1988, physical radiation surveys were conducted in

~~8902230003~~ 4pp

areas under NRC jurisdiction with a survey instrument that was last calibrated on May 20, 1988. Several other examples of use of survey instruments which had exceeded the quarterly calibration dates were also noted by the NRC inspectors.

This is a Severity Level IV violation. (Supplement VI)

3. 10 CFR 34.33(c) requires that pocket dosimeters be checked at intervals not to exceed one year for correct response to radiation.

Contrary to the above, on January 11, 1989, the NRC inspectors determined that three pocket dosimeters used in areas under NRC jurisdiction since the previous NRC inspection on February 11, 1987, through November 18, 1988, had not been checked for accuracy within 1 year of their use.

This is a repeat violation.

Severity Level IV violation. (Supplement VI)

4. 10 CFR 20.409(b) requires that certain licensees make a report to the individuals involved, of the radiation exposure of each individual who has terminated employment.

Contrary to the above, as of January 11, 1989, the required report had not been provided to the individuals involved, for two individuals who terminated employment in July and October 1988.

This is a Severity Level V violation. (Supplement IV)

5. 10 CFR 71.5(a) requires that licensees who transport licensed material outside the confines of their plants or deliver licensed material to a carrier for transport comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Part 170-189.

49 CFR 173.476(a) requires, in part, that each shipper of special form radioactive material shall maintain on file for at least 1 year after the last shipment a complete safety analysis, including documentation of any tests, demonstrating that the special form material meets the requirements of 49 CFR 173.469.

Contrary to the above, on January 11, 1989, the NRC inspectors determined that the above specified file had not been maintained for the model RG-13 special form sources routinely shipped by the licensee.

This is a Severity Level V violation. (Supplement V)

Pursuant to the provisions of 10 CFR 2.201, Houston Inspection Laboratories, Inc. is hereby required to submit to this office, within 30 days of the date of

the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,
this day of 1989.

MS-15 Request
February 14, 1988

Houston Inspection, Inc.
Gene Waltman, Vice President

1. Practical examination items should be discussed in more detail. Provide a copy of Items covered in the practical examination portion of your radiographer examination.
2. Define White I, Yellow II, and Yellow III. Radioactive placard only required when Yellow III is being used.
3. CRA posting needed when using a vehicle for storage.

Licensee agreed to send in ASAP.

A handwritten signature or set of initials is enclosed within a hand-drawn circle. An arrow points from the top left towards the center of the circle.