



REPLY TO A NOTICE OF VIOLATION

August 29, 1989

Director
Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Re: Docket: 30-17243
License: 42-01485-04
EA: 89-93

Gentlemen:

The enclosed check in the amount of \$2,500 is submitted along with the following information, in response to referenced Notice of Violation.

I. Violations Assessed a Civil Penalty

A. Texas Nuclear admits the violation listed in Item A.

We have reviewed and revised our Procedure for Isotope Use Off Site; and have conducted review sessions for all supervisory and technical personnel who might have cause to work with isotopes off site. The revised procedure has been reviewed by the Radiological Health & Safety Committee, as has the Notice of Violation.

These corrective actions put Texas Nuclear in full compliance. A review of responsibilities, and instruction of off site procedures will continue on an ongoing basis for supervisory and technical personnel.

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B. Texas Nuclear admits the violation listed in Item B.

Corrective actions have been taken in that all Texas Nuclear personnel who have personnel monitoring devices issued, have again been instructed in the necessity of carrying them on their person prior to and during any work which may create or place them in a radiation area.

Additionally, all Texas Nuclear personnel who travel to customer sites have received specific instruction with regard to the necessity of surveying radiation fields; estimating exposure; and providing instructions and if necessary, personnel monitoring devices to additional persons who might be entering the radiation area.

These corrective actions put Texas Nuclear in full compliance. A review of responsibilities, and instruction in personnel monitoring requirements will continue on an ongoing basis for supervisory and technical personnel.

C. Texas Nuclear admits the violation listed in Item C.

Corrective actions include a review of posting requirements with all technicians who may be dispatched from Texas Nuclear. Service personnel have been provided with additional instruction in the requirements for posting, and the meaning and use for signs to be carried to and posted at job sites.

These corrective actions put Texas Nuclear in full compliance. Continued review of these requirements will be ongoing with supervisory and technical personnel.

D. Texas Nuclear admits the violation listed in Item D.

Supervisory and technical personnel have received additional training in the requirements for surveys performed at a job site. A reinforcement of this training will be provided at regular intervals for appropriate personnel.

E. Texas Nuclear admits the violation listed in Item E.

Supervisory and technical employees involved in working off-site with customer personnel have received additional instruction on the requirements for providing said personnel with information regarding health protection, precautions to minimize exposure, and regulatory compliance as they relate to work in a restricted area.

These corrective actions put Texas Nuclear in full compliance. Refresher training will be provided for appropriate personnel on an ongoing basis.

II. Violations Not Assessed A Civil Penalty

A. Texas Nuclear admits the violation listed in Item A.

The evaluation of dose assessment falls within the responsibility of the Environmental & Technical Services section of Texas Nuclear. By the time we became aware of the incident, the reporting time frames had been exceeded. The potential over exposure erroneously reported to the State of Texas was done quickly, based on rough estimates made by a technician and was not as complete as later work.

Future dose assessments will be made as completely as possible with available information, but will not be delayed while awaiting additional data.

Based upon corrective action taken and a heightened awareness of potential problems, we will be more timely in our assessment of dose.

B. Texas Nuclear admits the violation as written in Item B.

The report of this incident was erroneously made to Texas rather than the NRC. Reporting requirements have been reviewed with appropriate personnel at Texas Nuclear, and future required reporting will be done in a timely fashion to the appropriate agency.

Texas Nuclear has reviewed and revised policies and procedures to meet regulatory requirements as indicated in referenced Notice of Violation and to the best of our knowledge, we are in full compliance with all issues. As indicated, ongoing review and instruction will be provided for all appropriate personnel to insure a continued recognition of requirements and procedures.

We trust this response provides you with the information required.

Sincerely,

TEXAS NUCLEAR CORPORATION



W. G. Hendrick
Director
Environmental & Technical Services

WGH:pz
Enc.