



Engineers and Constructors

JACOBS PAN AMERICAN CORPORATION

March 22, 2001

United States Regulatory Commission Region II
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW Ste 23T85
Atlanta, GA 30303-8931

RE: Confirmatory Action Letter

Dear Mr. Henson,

This letter is in response to Item #3 of the Confirmatory Action Letter (CAL No.2-01-01). On February 19, 2001 I began a third party audit program to audit regulatory compliance by Jacobs Pan American Corporation's Radiographers and Assistant Radiographers. This lasted until 3-22-01.

During this time individual radiography performance audits were conducted with members of JPAC radiography staff. In general all participants performed all licensed activities in a professional manner and with a good attitude for their work. Only a few minor comments were necessary to be addressed during these radiation safety audits.

1. Surveys of exposure to device and guide tubes after each exposure.

It was observed that one radiographer approached the exposure device quite rapidly while observing the survey meter. My comment was that he needed to approach the exposure device at a slower pace to allow the survey meter to register any activity on the meter. Later audits showed this individual took the above comment and has changed his device survey method. This was observed several times both unannounced and from a distance away unknowingly to the radiographer.

2. Connecting control cable to source.

The use of AEA 550 No-Go-Gauge has been used by all the radiographers on the initial connection of each shift. This was witnessed on February 19 to March 22, 2001.

3. Storage area and storage containers.

I have witnessed the radiographers taking the exposure and source from storage several times. I have a good vantage point from my office window. Each time the area was approached by the radiographer or assistant using a survey meter. First checking the outside of the storage container and after opening the container surveying the exposure device before removing it from the container.

4. Boundaries, barricades and signs.

This was observed as not being a problem. The boundary was first calculated, barricaded and posted and then later verified during the first exposure using survey meters.

5. During the last couple of weeks of a turnaround at the FCC Unit.

A subcontractor sign off sheet was initiated. This document was signed by each craft or subcontractor notifying them that radiography was going to take place during the next window (lunch time, shift change etc.) With their signature they are responsible to notify and remove their people from the proposed radiation area during the next exposure window. This worked well and we are using it at a new turnaround area. This has helped the radiography crew by having the subcontractors responsible for their people.

The content of this letter will be read and reviewed by all of the radiographers and assistants at our next weekly safety meeting on March 26, 2001.

It is the consensus of this writer that all the participants audited and observed are diligently striving to have a safe incident free radiation work area.

Yours truly,

A handwritten signature in cursive script that reads "Charles J. Benson". The signature is written in dark ink and is positioned above the printed name.

Charles J. Benson
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State of Texas ID# 00217
State Audit# 08845