



## APPLIED TECHNICAL SERVICES, INCORPORATED

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July 29, 1999

Mr. David Collins  
US NRC RII  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

Re: NRC Source License for Virginia

Mr. Collins,

Any new radiographic equipment to be utilized by ATS in Virginia will be registered and a written procedure on use will be approved prior to use. As requested, I have attached the changes to ATS 125(VA) Operating and Emergency Procedures. They include verification of new employee's previous experience, and the change of film badges to dosimetry. ✓

If you have any questions or comments, or if I may be of any assistance, please do not hesitate to call me at (757) 558-0016. Thank you again for your assistance. ✓

Sincerely,

Christopher J. Vorwald  
Regional Manager

**APPLIED TECHNICAL SERVICES, INC.**  
**Operating and Emergency Procedures**  
**Radioactive Sealed Sources**

**7.4 New Employees With Previous Training**

- Provide documentation showing previous experience levels, certifications, training, etc. that satisfy the requirements of a radiographer as outlined in Section I Part 7.3. (RSO will verify all documentation submitted to ATS)
- Attend a counseling session with the RSO discussing radiographic operations in accordance with all Materials License conditions.
- Pass a 50 question comprehensive exam with a minimum score of 80%.
- Pass a 20 question specific exam with a minimum score of 80%.
- Pass a practical exam with a minimum score of 80%.

**7.5 Annual Refresher Training**

- Each radiographer and radiographer's assistant must attend a minimum two hour training program at least once a year. The annual refresher training must address the following topics:
  - Internal radiographer experiences
  - Personnel radiation doses and dose reduction measures (ALARA)
  - New regulation/procedural changes
  - Review of Operating and Emergency procedures
  - Review of equipment operations

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**SECTION II**  
**PERSONNEL MONITORING AND THE USE OF**  
**PERSONNEL MONITORING EQUIPMENT**

**1.0 SCOPE**

This section is to provide specific instructions for wearing personnel monitoring equipment and the actions to be taken in the event of a pocket dosimeter found to be off scale or an alarming ratemeter sounding unexpectedly.

**2.0 DOSIMETRY**

Each employee will use a N.A.V.L.A.P. certified agency for dosimetry. Dosimetry must be worn during all radiographic operations. Dosimetry may be worn at any convenient location between the shirt collar and front trouser pockets (i.e. shirt pockets or belt loops). When not engaged in radiographic operations, dosimetry must be stored away from sources of radiation. Dosimetry shall be exchanged monthly and dose reports recorded monthly.

**3.0 POCKET DOSIMETER**

Each employee must wear a calibrated direct reading pocket dosimeter during all radiographic operations. Dosimeters shall be calibrated annually. Dosimeters may be worn at any convenient location between the shirt collar and front trouser pockets (i.e. shirt pockets or belt loops). The pocket dosimeter must be charged and zeroed before each shift, and the reading at the beginning and end of each shift must be recorded. Employees should frequently read their dosimeters during radiographic operations. Should the pocket dosimeter be found to be off scale at any time during radiographic operations, the employee must stop work immediately, place the source in the safe storage position in the exposure device, vacate the radiation area, notify the RSO, and submit their film badge for processing. Do not resume operations until authorized by the RSO or RSO designee.

**4.0 ALARMING RATEMETER**

Each employee must wear an alarming ratemeter which is pre-set and calibrated annually to alarm at radiation levels greater than or equal to 500 mR/hr, except at permanent radiographic facilities where other appropriate alarm or warning devices are in routine use and are operable. The alarming ratemeter shall be checked prior to each shift to ensure proper operation. The alarming ratemeter shall be worn in the same manner as the pocket dosimeter