

From: Donna Janda
To: JRiggs@schnabel-eng.com
Date: Mon, Apr 11, 2005 11:48 AM
Subject: Questions regarding amendment request

Licensee Name: Schnabel Engineering, Inc.
License No.: 45-19703-01
Docket No.: 03019126
Mail Control No.: 136434

Dear Mr. Riggs,

Thank you for returning my call from last week. As I stated in my voice mail message, I have the following questions regarding your amendment request dated February 2, 2005:

1. Your Radiographic Operating & Emergency Procedures manual, NDE-RS-01, does not contain all the required information necessary to complete our review.

a. In Section B, Item (9)(B), Procedure for Response to Off-Scale Dosimeter), Step 6 states that the Corporate/Facility RSO shall notify the dosimeter processor that Luxel badge(s) are being sent in for rush processing.

10 CFR 34.47(d) states, in part, that if an individual's pocket chamber is found to be off-scale and the possibility of radiation exposure cannot be ruled out, then the individual's dosimeter must be sent for processing within 24 hours. In addition, the individual may not resume work associated with licensed material until a determination of the individual's radiation exposure has been made. This determination must be made by the RSO or the RSO's designee.

Please confirm that you will comply with the requirements in 10 CFR 34.47(d). In addition, please revise your procedures to include these requirements.

b. In the Intensity & Dose Calculations portion of Section C, Source Retrieval Guidelines, D2 is defined twice and D1 is not defined. Please provide the correct definition of D1 and revise your procedure accordingly.

c. In Section D, Equipment Operation, Item (7) describes the leak test swab procedure. Step 7 of the procedure states, "If the radiation levels detected on the swab are less than 2 mR/hr above background...". The note following Step 7 states, "If the survey detects more than .2 mR/hr (above background)..." Please revise your leak test procedure to include the correct action level.

2. Provide a copy of a typical examination and the correct answers to the examination questions.

3. Describe the field (practical) examination that will be given to prospective radiographers and radiographer's assistants.

4. Describe the annual refresher training program, including topics to be covered and how training will be conducted.

5. Submit your procedures for verifying and documenting the certification status of radiographers and for verifying that their certification remains valid. As a minimum, your procedures for newly hired, previously certified individuals should require documentation of your contacting the certifying entity and confirming the certification. Your procedures should also ensure you are aware of certification expiration dates and that individuals with expired certifications do not work as radiographers.

6. 10 CFR 34.43(a)(1) requires, in part, that individuals receive a minimum of 2 months of on-the-job training before being permitted to act as a radiographer. Please revise your procedures to include this requirement.

7. Please provide a copy of your Radiographic Field Operations Inspection Report for our review.

Please provide your response to these questions within 15 days. If you have any questions regarding this email, please call me at 610-337-5371. You may email your response to me at dmj@nrc.gov or by fax to 610-337-5269. Please include Mail Control No. 136434 in your response.

Thank you very much for your attention to this matter.

Sincerely,
Donna M. Janda
Health Physicist
Security and Industrial Branch
Division of Nuclear Materials Safety
U.S. NRC Region I

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From: Donna Janda

Created By: DMJ@nrc.gov

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