



A Member of the MISTRAS Holdings Group

July 7, 2006

US Nuclear Regulatory Commission
Region III – Inspection and Enforcement
2443 Warrenville Road, Suite 210
Lisle, IL. 60532-4352

030-35114

US Nuclear Regulatory Commission
Region I - Inspection and Enforcement
475 Allendale Road
King of Prussia, PA 19406
Attn: Kathy Modes

RE: License 12-16559-02 NOV follow up

Dear Sirs:

The following correspondence is in response to Ms. Kathy Modes' (Region I) request for additional information concerning our follow through regarding our corrective actions. Her concern was based on the fact that we had three incidents that resulted in overexposure to our personnel, and the corrective actions from one incident did not prevent the subsequent incidents from occurring.

As the Corporate RSO for MISTRAS Holdings Group there is no one who shares the NRC's concerns about the implementation of our corrective actions more than I do. I have reviewed the circumstances surrounding each of the incidents that resulted in overexposure to one of our employees over the past year and a half. Although the circumstances were similar, each incident was unique and had its own contributing factors. In the first incident, the radiographer was aware of the elevated survey readings and chose to proceed in violation of our established policies and procedures. His actions led to his exposure in excess of the regulatory limits. The corrective actions for this incident focused on the retraining to the staff on what to do when "abnormal" survey readings were encountered. In the second incident, the radiographer failed to perform the required survey after making an exposure. He also neglected to rotate and lock the selector ring on the 660 camera he was using. The corrective actions in this incident focused on the sequence of steps to take to properly retract and secure a source. The third incident, while similar to the second based on the lack of properly performing a survey, had a root cause that was based on the relative inexperience of the assistant radiographer involved (one week) and the lack of proper supervision by the radiographer. The corrective actions stemming from that incident have focused on the limitation of job duties assistant radiographers are allowed to perform. A contributing factor may have been the fact that the equipment involved in the third incident was different from the second, so personnel may have believed that the corrective actions from the second incident didn't apply to them. I am in the process of recapping these incidents, the causes, and the corrective actions to ensure all technicians are aware of what occurred, what the proper response



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should have been, and what to do in the event that something similar happens to them.

My foremost concern, however, isn't necessarily the technicalities as to why the overexposures have occurred, but the simple fact that three of my employees received a significant amount of dose, all of which could have been prevented by following proper procedure. I am investigating implementing additional behavioral based incentives and reinforcements to try to understand why personnel who know better, choose to ignore the procedures. I have discussed getting messages attached to or printed on the employee pay stubs. We may implement a quarterly "refresher" training topic bulletin to continue to keep these incidents and other noteworthy topics fresh and on the technician's minds. I am also investigating the feasibility of mandatory internet-based retraining modules that could be accessed by our technicians from various locations.

I have discussed my ideas and concerns with our company management. Everyone involved with the Radiation Safety program is looking at ways we can improve our program, its implementation and follow through to ensure we are doing everything we can to not only remain compliant, but to minimize the risk of excessive exposure to our personnel and to the general public. I would welcome suggestions you may have to further increase the effectiveness of our corrective actions.

Please let me know if there is additional information you need in order to close out this compliance issue. If you have any questions, or would like to discuss this further, please contact me at 630-260-1650 ext.166.

Sincerely,

Scott A. Kvasnicka
Corporate RSO
MISTRAS Holdings Group