



DBI, Inc. Quality Inspection and Consulting Services

Reliable...Responsive...Resourceful...Proactive

July 7, 2011

U.S. Nuclear Regulatory Commission
Region IV, 612 East Lamar Blvd, Suite 400
Arlington, Texas 76011

Attention: James Thompson

Dear Mr. Thompson,

The inspection conducted on July 1, 2011 for NRC License 49-29301-01, found three violations as stated per our conversation on July 5, 2011. The following are the violations and the corrective actions taken:

1. Contrary to 10 CFR 34.41(a), the "two-man rule," requires when radiography is performed at a location other than a permanent radiographic installation, the radiographer must be accompanied by at least one other qualified radiographer or an individual who has at a minimum met the requirements of 34.43(c).
2. Contrary to 10 CFR 34.49(b), "radiation surveys", requires using a survey instrument to conduct a survey of the radiographic exposure device and the guide tube after each exposure when approaching the device or the guide tube.
3. Contrary to 10 CFR 34.46, "supervision of radiographers" assistants, requires whenever a radiographer's assistant uses radiographic exposure devices, associated equipment or sealed sources or conducts radiation surveys required by 34.49(b) to determine that the sealed source has returned to the shielded position after an exposure, the assistant shall be under the personal supervision of a radiographer.

(a) Corrective Actions:

1. Both the radiographer and assistant radiographer have been suspended from performing any radiography until both have gone through re-training on radiation safety and U.S. NRC regulations.
2. Re-training will be completed on July 14th and 15th, 2011.

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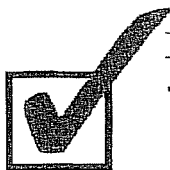
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3. An e-mail shall be distributed to the Operation Managers and the Assistant RSO's concerning the found safety violations. The Operation Managers will distribute this e-mail to radiographic personnel and a verification sheet shall be signed and dated to be returned to the Corporate RSO by July 13th, 2011.
4. E-mail completed and distributed on July 6th, 2011.
5. An internal investigation shall be conducted to determine the root cause of why the violations occurred.
6. Internal investigation completion date will be by July 15, 2011.
7. Unannounced field audits are to be performed beyond the requirements of the U.S. NRC regulations to help ensure radiation safety is being implemented by the radiographers and assistant radiographers.
8. Initial field audits to be completed by August 31, 2011.

If there are any questions please feel free to contact me at (402) 467-1818 or pfrye@dbindt.com.

Sincerely,

Pennie Frye
Corporate Radiation Safety Officer

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