

JT Cullen



INDUSTRIAL INSPECTION AND TESTING SERVICE

P. O. Box 311, Rt. 84, Fulton, Illinois 61252 — Phone (815) 589-2412 — 24 Hrs.
Non-destructive Testing, ASME, API, and other specifications



May 30, 1985

W. L. Axelson, Chief
Nuclear Materials Safety & Safeguards Branch
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Axelson:

This is in reply to your letter of 5-21-85 concerning the inspection performed on 5-9 & 5-10-85 of our activities under license number 12-15025-01. Our reply to the findings of non-compliance are as follows:

Item 1 - This problem has been discussed with top management and the necessity of compliance with the letter of the procedures was emphasized. A training log or similiar record keeping method will be implemented and will be in use within 30 days.

Item 2 - This was caused by an unfortunate choice of wording on my part when the license was revised several years ago. I stated "radiation worker" when I intended to mean "Radiographer or Radiographer's assistant" with regard to requiring film badges. In effect we have been complying with the NRC regulations but not with the letter of our own procedures. A film badge for this worker has been ordered and received and our procedures will be more closely followed, effective immediately. However, we would like approval by this letter to adhere to the NRC regulation wording, rather than the wording in our procedures in this matter.

Item 3 & 4 - The omission of these two items was an oversight on the part of the RSO due to heavy work load in other areas. To help prevent a reoccurrence, a separate log will be maintained for these items and should be in use within 30 days.

Item 5 - This check on dosimeter response was performed but not recorded. Often, work requirements are such that one job will be interrupted to start another on a rush basis. This is likely what caused the lack of a recording of results. The response check was performed, I was interrupted and never returned to finish the paper work. A new check sheet will be generated to facilitate recording this information on the spot. This should be in effect within 30 days.

NON-DESTRUCTIVE TESTING — METALLURGICAL CONSULTATION
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Item 6 - The requirement for posting the high radiation area has been overlooked on these occasions due to the nature of the location of our work. It is frequently impractical to post this area since there is little or no place to put these signs. However, new signs are on order and, upon arrival, this regulation will be discussed with all radiographers and their compliance required, effective within 30 days.

At this time, I wish to express our strong desire to have this part of the regulations removed. Since we are required to post and maintain surveillance and control over the radiation area, the high radiation area is automatically included. This posting of the high radiation area, therefore, is an unnecessary burden on our operations.

Item 7 - The report of the individual in question was not sent since he was on temporary lay-off. Since I did not feel this constituted termination, his report was not formally filed, although he was informed of his total dose for his own reference. I was in the process of discussing the cancellation of his badge and filing this report just prior to the 5-9 & 5-10-85 inspection date. This has now been done and the final report will be filed within 30 days after the final reading on his badge is received. Hereafter, even if a person is only laid-off, a final report will be filed and, if he is brought back, his badge will be reinstated.

Finally, I wish to make the following comments:

We are a small company with only 5 men at present working with any regularity in radiography. As such, we do have better control over who works on these jobs and can be sure they work safely, even though our documentation may not show it. Since we are small, these men are doing other things besides radiography when there is no radiography to be done. This includes the RSO. Much of our work is done by verbal instruction, thus we never really got used to the extensive paper work. This will be corrected in the future. Paper work or not, this is to assure you we have an organization which does and will operate safely. With few people all operating out of one small office, it is easy to maintain this control.

We have always strived for safe operation. It has always been strongly emphasized to use calibrated survey meters diligently. After all, the radiographer is first protecting himself. I do not want and will not use hap-hazard workers. While our paper work may not be quite up to par, our actual operations are safe and will continue to at least with the intent of the NRC regulations, that being to protect radiation workers and the general public from



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excessive radiation. As stated above, we will also strive for better documentation of what we are doing.

We feel also that many of the NRC regulations are firmly against business in general. We are in this business to make money and the NRC & DOT are continually adding fees and paper work requirements which do nothing but eat up profits. General industry has a very strong need for our type of services, but if these expenses keep accelerating at the current pace, either the costs to industry must go up to compensate for these extra costs or this business will be forced to stop operation, adversely affecting the safety of the public in many other ways, such as equipment that cannot be checked to make sure it is safe.

As examples of excess expenses, I can point to the recent separate fee for our authorization to transport our equipment, something previously covered in our operating procedures. It seems that the only reason this was done was to generate revenue for the DOT and otherwise does nothing to improve operations.

More and more reports are being required for the NRC and for the state of Illinois, causing higher overhead costs. This letter alone will take over 4 hours to compose, write and type, plus it will take approx. 30 hours to handle the inspection and perform the necessary tasks to meet your requirements, when our operations already conform to the intent if not the letter of the regulations.

I would like to suggest as a starting point, the adjustment of inspection and license fees to reflect the size of actual operations. To charge the same fee to us when we only have five men working part time as is charged to other companies with 20 or more men working full time is rather inequitable. It make me think that the people writing these regulations don't want small businesses like us to survive. If something is not done soon to alleviate these expenses, our profit will be gone and our business will cease.

We want to operate within the law but it is becoming increasingly difficult to do so economically. We will, however, comply with the law until such time as it is changed or we go out of business.

Sincerely,

Rex H. Winget, RSO

RHW/jb