

Telephones

(215) 362-2600

(215) CH2-8525

# HAINES & KIBBLEHOUSE, INC.

*Demolition*

*Excavating & Paving*

P. O. BOX 196 - SKIPPACK, PA. 19474



April 11, 1985

MS 16  
P8

Attn: John E. Glenn, Ph.D.  
U.S. Nuclear Regulatory Commission  
Region 1  
631 Park Ave.  
King of Prussia, PA 19406

Docket No. 030-22110  
Mail Control No. 03429

Re: Haines & Kibblehouse, Inc.  
Application for By-Product  
Material License

Gentlemen:

Please find enclosed two copies of our Radiation Safety Program containing the changes mentioned in your letter of April 5, 1985. If these changes are not clear as to our intentions, please contact me.

Very truly yours,

Harry R. Budenz, Jr.

HRB/bjv

Enclosure

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Radiation Safety Program

1. Radiation Safety Officer

A. Harry C. Budenz has been designated as the company Radiation Safety Officer and will assume the duties and responsibilities that include the following:

1. To ensure that all terms and conditions of the license are being met and that the information being contained in the license is up-to-date.
2. To ensure that the equipment has been leak tested in the required timely manner and that the leak test is performed in the manner prescribed by the equipment manufacturer.
3. To ensure that the use of the equipment is only by individuals that have been authorized by the Radiation Safety Officer and that all users wear G-1 Badge personnel monitoring equipment when utilizing the equipment (Manufacturer of G-1 Badge: R. S. Landauer, Jr. & Co.) with an exchange of Badge on a quarterly basis. \*See Note
4. To maintain the records as required by the license and the regulations. These records shall include personnel exposure records, leak test records and training certificates for all users.
5. To ensure that the equipment is properly secured against unauthorized removal at all times when it is not in use.
6. To serve as a point of contact and give assistance in case of emergency such as equipment damaged in the field or theft and to notify the proper authorities in case of emergency.
7. To ensure that all users have read and understand the radiation safety operating and emergency procedures.
8. To post NRC Notice to Employees in a highly visible area.
9. To post "Warning Radioactive Material" on the storage location.

A. Location #1 at: Blooming Glen Quarry, Div. of  
Haines & Kibblehouse, Inc.  
Old Bethlehem & Quarry Roads  
Blooming Glen, PA 18911

This storage location will have a metal box secured in a storage area with a lock on the metal box.

B. Location #2 at: Haines & Kibblehouse, Inc.  
2052 Lucon Road  
P. O. Box 196  
Skippack, PA 19474

This storage location will have a metal box secured in a storage area with a lock on the metal box.

Note: We are only purchasing a Troxler 4640 gauge at this time, with a gamma source which requires only a quarterly exchange of Badge. If we do decide to buy a Troxler 3411 gauge, we will change to a monthly exchange of Badge.

## 2. Operating Procedures

### A. Transportation of Equipment

1. All possible means shall be provided to ensure that the equipment is fully secured in the transporting vehicle and the equipment is away from the passenger compartment. When transporting in an enclosed vehicle (car or van), the vehicle will be locked. When transporting in an open bed vehicle, the gauge shall be securely fastened and locked to the truck bed.
2. The gauge will be transported in the TROXLER transportation case. The U.S. Department of Transportation requires that the gauge be transported in a properly labeled carrying case.
3. At all times during transport, the operator will have a properly completed Bill of Lading for each gauge.

### B. Utilization Procedures

1. When the gauge is in the field, we as the authorized user will maintain control over the gauge at all times. The gauge will never be left unattended.
2. When not making measurements, the gauge will be placed in the transportation case and returned to its permanent storage area as soon as possible. The gauge is to be used for its intended purpose only. By doing so, we will maintain any radiation exposure to as low as reasonably attainable.
3. When using the equipment, we will wear the G-1 Badge personnel monitoring device that has been assigned to us. When we are not using the equipment our monitoring device will be stored in the radiation free unit that has been designated in the office.
4. The gauge will be kept locked in the storage area. The only means for removal is to have the radiation safety officer unlock the door and record the gauge's destination for the day.

### C. Maintenance and Leak Test Procedures

1. Periodic maintenance will include cleaning the gauge. During any maintenance, we will wear our G-1 personnel monitoring device.
2. No maintenance will be performed in which the radioactive source is removed from the gauge. For this type of maintenance, the gauge will be returned to the manufacturer.
3. The leak test will be performed using the TROXLER Model 3880 Leak Test Kit. The leak test will be performed using the manufacturer's instructions. Again, the personnel monitoring device will be employed. Gauges will be leak tested at intervals not to exceed six (6) months.
4. If the source rod is removed for simple preventive maintenance procedures, the source rod will be placed in a lead pig.