



CTI

December 31, 1992

United States Nuclear Regulatory Commission  
Region V  
1459 Maria Lane  
Walnut Creek, CA 94596

Attention: Mr. Greg Yunas  
Chief

Subject: Docket No. 15000004  
License No. California 2851-07  
EA 92-127

Dear Sir:

In response to NRC (Washington D. C.) letter dated December 01, 1992, requiring a more detailed response to violations II.A, II.B, and II.C, CTI submits the following:

**II. Violations Not Assessed a Civil Penalty**

- II A. 10 CFR 34.28(b) requires that the licensee conduct a program for inspection and maintenance of radiographic exposure devices, storage containers, and source changers at intervals not to exceed three months or prior to the first use thereafter to ensure proper functioning of components important to safety.

Contrary to the above, from March 2 to July 1, 1992, an interval greater than three months, the licensee did not conduct inspection and maintenance of an exposure device (Amertest S/N 1351) that was used on five occasions between June 15 and 30, 1992 at Moffett Field, California.

This is a Severity Level IV violation (Supplements IV and VI).

**REVISED RESPONSE:**

The three (3) month interval for inspection and maintenance of radiographic exposure devices, storage containers, and source changers was not completed in a timely manner. Inspection and maintenance was conducted on March 2, 1992, and then again on July 1, 1992, resulting in an interval in excess of the required three (3) months.

*Confidence  
Through  
Inspection*

CTI, Incorporated  
2840 Howe Road, Suite C  
Martinez, CA 94553-4000

CA: 510/228-1500  
FAX: 510/228-1976  
USA: 800/626-6320

9302100119 930126  
PDR STPRG ESGCA  
PDR

RECEIVED  
INR  
REGION V  
1993 JAN -6 PM 12:54



#### CORRECTIVE ACTION

All radiographic exposure devices, storage containers, and source changers will be inspected at the end of each quarter. Scheduling quarterly inspections in this manner will eliminate the RSO having to remember or maintain a record or log on when a device last received its inspection and maintenance.

- II B. 10 CFR 71.12(a) and (c) (1)-(3) in part grant a general license to the licensee to transport a Type B radioactive package for which an NRC Certificate of Compliance (COC) has been issued, provided the user, who is not the original COC applicant, registers with the NRC, has a copy of the applicable COC, and complies with its terms and conditions.

Contrary to the above, as of July 2, 1992, the licensee had not registered with the NRC as a user of an Amertest Model 660 exposure device (S/N 1351) that was utilized as a Type B transport package between June 15 and 30, 1992.

This is Severity Level V violation (Supplement V).

#### REVISED RESPONSE

After a business separation in April 1991, CTI Martinez did not submit a request to NRC to be registered as a user for the Type B package USA/9033/B(U). CTI Martinez thought they were still in compliance with the registration of the COC for the Amertest Model 660 exposure device [USA/9033/B(U)], under the joint venture with CTI of Alaska (NRC licensee).

#### CORRECTIVE ACTION

A request to be registered as a user of the USA/9033/B(U) was sent to NRC on July 27, 1992.

- II C. 10 CFR 71.12(a) and (b) in part grant a general license to the licensee to transport a Type B radioactive package for which an NRC Certificate of Compliance (COC) has been issued, provided the licensee has an NRC approved quality assurance program.

Contrary to the above, as of July 2, 1992, the licensee did not have an NRC approved quality assurance program for a Type B package (Amertest Model 660 exposure devices) that was transported by the licensee between June 15 and 30, 1992.

This is a Severity Level IV violation (Supplement V).



USNRC  
Reply to Notice of Violation  
December 31, 1992  
Page 3 of 3

#### REVISED RESPONSE

After a business separation between CTI of Martinez and CTI of Alaska in April 1991 CTI of Martinez did not submit their own QA Program to NRC. Because CTI of Martinez did not have an NRC license they did not realize that it was required under their California radioactive materials license.

#### CORRECTIVE ACTION

On July 27, 1992, CTI of Martinez submitted a QA Program to NRC. A check for the License Fee in the amount of \$230.00 was sent to USNRC on December 18, 1992. CTI is currently awaiting approval of the submitted Program.

Hopefully this response has met with your approval and will resolve this matter to your satisfaction. However, should you require additional information or clarification, please do not hesitate to contact the undersigned.

Sincerely,

Steven D. Ewing  
Radiation Safety Officer