

**UNITED  
INSPECTION  
INC.**6700-A NEW SAPULPA ROAD  
TULSA, OKLAHOMA 74131*Hooper*

April 23, 1985

To: Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555

From: United Inspection Inc.  
6700-A New Sapulpa Road  
Tulsa, Okla. 74131

Gentlemen:

In response to the Notice of Violation and Proposed Civil Penalty  
I would like to state the following:

1. The Storage of licensed material at a place not licensed as a  
storage facility:

- (1) This was done at Happy Company in Tulsa.
- (2) It was intended to be licensed as a storage facility.
- (3) The source is now being taken back and forth daily from the  
licensed storage facility.
- (4) This will not be done with any facility until it is licensed  
as a storage facility.
- (5) Full compliance was achieved immediately after the inspection  
and an ammendment is already in the mail to license this fac-  
ility as a storage place.

2. Radiation levels in an unrestricted area not being in limits.

- (1) This was at Happy Company in Tulsa.
- (2) This facility was purchased from another company who had been  
using it as a radiographic site. It was not fully checked out by  
me and was evidently not being surveyed properly by the radio-  
grapher in charge of the job site.
- (3) A new wall was erected immediately to shield the area with the  
high level of radiation.
- (4) In the future spot checks will be stepped up to assure that  
radiation surveys are taken as required.
- (5) Full Compliance was Achieved within 1 week after inspection.

3. Inadequate survey being taken on jobsite.

- (1) This was done at Happy Company in Tulsa.
- (2) There was no reason for this. It was neglect on the part of the  
Radiographer.
- (3) Each radiographer has been reminded how, when, & why to conduct  
surveys.
- (4) Spot checks are currently being done on a regular basis to ass-  
ure that the radiographers are filling out their survey reports  
properly and are actually conducting surveys when they state that  
they are doing so.

- (5) Full compliance was achieved Immediately after Inspection.
4. Warning lights and alarms were not present at a permanent radiographic facility.
- (1) This was at Happy Company in Tulsa.
  - (2) This facility was sold twice in two days and the first buyer removed the alarms and lights that were there. We had not replaced them at the time of the inspection. They were ordered, but we hadn't really pushed the builder to hurry them.
  - (3) A system was installed to comply with 10 CFR 34.29(b).
  - (4) In the future a permanent facility will not be used until properly outfitted.
  - (5) Full compliance was achieved within two weeks of inspection.
5. Pocket dosimeters were not being recharged properly.
- (1) This was being done at Happy Company in Tulsa.
  - (2) This radiographer was not coming to the office daily.
  - (3) Each truck and darkroom have a dosimeter charger so that if they do not come in daily they can still recharge their dosimeters daily.
  - (4) Each truck and darkroom have a dosimeter charger.
  - (5) Full compliance was achieved immediately after inspection.
6. Records of Oral tests were not properly maintained.
- (1) This was done at our office in Tulsa.
  - (2) Oral exams were given by the RSO, but were not recorded properly.
  - (3) An oral exam was administered again by the RSO and Documented properly in writing.
  - (4) In the future all employees regardless of past experience will be given this exam before doing any work for United Inspection.
  - (5) Full compliance was achieved January 17, 1985.

In summary I would like to say that I believe the penalty is warranted and as serious as these offenses seem, I believe that this inspection has impressed on me the need to spend more of my time performing my duties as RSO and to get knowledgeable help in areas that I need it. I have retained the services of Dr. David S. Gooden to help me as a consultant, and he has already been a big help in achieving that goal.

Sincerely;  
*Ernie C. Busby*  
Ernie C. Busby  
RSO United INSpection

*Ernie C. Busby*

NOTARY PUBLIC

MY COMMISSION EXPIRES

*Lorain M. Philzot*  
12-3-88