

APR 19 1985

Crane Midwest Fittings
ATTN: Mr. George W. Eckert
Superintendent Quality Assurance
1450 South Second Street
St. Louis, MO 63166

License No. 24-00563-02

Gentlemen:

This refers to your application dated July 29, 1983, and to the telephone conference held between you and Mr. J. R. Madera of Region III on October 15, 1984, regarding the renewal of license No. 24-00563-02. In order for us to complete our review of your application, we need additional information and clarification regarding the following:

1. Qualifications

Your application in Section II of your Operating and Emergency Procedure Manual, indicates that David F. Betz, Manager of Quality Assurance and Thomas D. Voss, Nondestructive Test Department Supervisor, have responsibilities in your radiation protection program. However, it is not clear whether they have received radiography training at Crane Midwest Fittings or if they are certified radiographers. Individuals with responsibility for active control of radiography programs should have training and experience equivalent to that of a qualified radiographer. Please submit the qualifications of these individuals. If they have not operated as radiographers for a minimum of one year, you will need to modify your organization to remove them from responsibilities in the radiation safety program until such time that they receive the experience needed.

2. Emergency Procedures

Section III, Item 2.4 of the safety manual, states that in the event of a lost source, the Radiation Safety Officer will locate the source and replace it in the device or a container as soon as possible. During the telephone conference of October 15, 1984, it was learned that the Radiation Safety Officer in charge of source retrieval has had no training or previous experience in performing this type of operation. In view of this, please revise your emergency procedures in the event of a lost source to have it replaced or retrieved by an individual or individuals who have had experience in this type of operation (e.g., the manufacturer) and resubmit.

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3. Training

Section I of your manual states that a radiographer must have 80 hours of on-the-job training. It is an NRC requirement that radiographers receive 520 hours or 3 months on-the-job training before being certified. Please revise your training program to reflect the necessary requirement for on-the-job training for radiographers trained at Crane Midwest Fittings and resubmit.

4. Surveys

Submit the results of radiation level calculations or actual radiation measurements in and around your fixed exposure cell when the sources are in their stored positions and in the position that would result in the worst case exposure. Your measurements should be performed at various points 18 inches from the exterior surfaces of the shielding walls in all areas adjacent and at the roof of the facility. If construction requirements preclude you from maintaining levels at or less than 2 mR in any one hour, you will need to submit the information requested in Item 9.3., pages 11 and 12 of the enclosed radiography guide.

5. Device Surveys

Please revise Item 2.12 of Section III, Appendix A, "Specific Instructions for Making an In-House Exposure" of your manual to indicate a reference point on your devices for taking survey readings and to provide the actual exposure level that should be obtained at this point when the source is in its stored or safe position within the device. The range of levels indicated in Item 2.12 is too wide to provide any gauge for the radiographer as to whether or not the source is safely shielded.

6. Locations of Use

Your application indicates use at only 1450 South Second Street; however, your current license authorizes use at temporary job sites. Please clarify by indicating all places that will be used for radiographic operations, source exchange, or storage of devices. For storage and fixed sites, you will need to submit the information requested in Item 9 of the enclosed radiography guide. For temporary sites, you will need to submit the information requested in Items 10.4.1, 10.4.3, and 10.4.6 of the radiography guide.

7. Material to be Possessed

Your current license specifies use of iridium-192 in Tech. Ops. Model 489 and cobalt-60 in Tech. Ops. Model 741 exposure devices. However, your

application does not request renewal of this authorization. Please clarify. If you do not desire to continue this authorization, you will need to indicate the disposition of the radioactive material in these devices.

Our review of your application will continue upon receipt of the above information. Please reply in duplicate within 60 days and reference Mail Control No. 15450.

Sincerely,

Original Signed By
John R. Madera
Materials Licensing Section

Enclosures:

1. Revision 2, Regulatory
Guide 10.6
2. Custom Made Sealed Source
and Devices Guide