



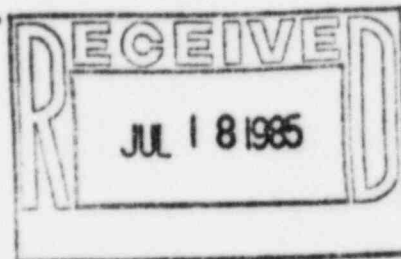
MET•CHEM

TESTING LABORATORIES, OF UTAH, INC.
369 West Gregson Avenue Salt Lake City, Utah 84115 (801) 487-0801

Docket: 30-19059/85-01
License: 43-19662-01

July 17, 1985

Mr. Jerry Everett
U.S. Nuclear Regulatory Commission
Region IV Office
611 Ryan Plaza Drive - Suite 1000
Arlington, Texas 76011



Dear Mr. Everett:

This letter is an effort to state the cause, corrective action and date of full compliance of violations noted during an audit conducted by Mr. Blair Spitzberg and Mr. Larry Ricketson of the U.S. Nuclear Regulatory Commission and Mr. Craig Jones of the Utah Radiation Control Center in June of this year.

Prestatement:

In an effort to make management adjustments to avoid violations of the nature contained in this letter, I as president have completed or will complete the following:

1. I have hired a full-time Radiation Safety Officer with more than sufficient background to comply with the requirements of our license.
2. I have established a job description for the Radiation Safety Officer which gives full authority to the Radiation Safety Officer to regulate our radiation control system and enforce as necessary for compliance with all of the rules set forth in our license package.
3. We have established a Quality Assurance Program and an internal audit procedure. This audit will be completed periodically to help us avoid oversights of any nature.

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As president of Met-Chem Testing Laboratories of Utah, Inc., I would like to state at this time that regardless of the outcome of this audit, I assure you that I will give full commitment to correcting our radiation control system. I am convinced that our problems are not a lack of proper procedures or quality systems, but have been a lack of effort to follow the system established.

The items as discussed during the enforcement conference held in your office in Arlington, Texas are as follows:

1. Violation: An unqualified radiographer was allowed to work as a radiographer. The lack of qualification was due to failure to pass the radiation safety test.

Corrective Steps Taken: We have reviewed each current radiographer's packet to assure compliance with qualification requirements. The radiographer in question is no longer works for our company, all current radiographers are qualified.

Corrective Steps To Be Taken: We have designed a form which states the date of the radiation safety course, the results of the safety test, approval by the Radiation Safety Officer and acknowledgement by the technician's supervisor that he has or has not qualified as a radiographer or radiographer assistant.

Date of Full Compliance: Immediately

2. Violation: Failure to rebadge Mr. Jim Shupe after an exposure was received to his badge only.

Corrective Steps Taken: I have refamiliarized myself with the requirements for rebadging after an exposure to a badge only.

Corrective Steps To Be Taken: Each film badged individual has been instructed and will be re-instructed annually during their radiation safety annual training that any time the badge only is exposed that the individual must receive a new badge prior to returning to work.

Date of Full Compliance: Immediately

3. Violation: Some individuals have shown on their Dosimetry Log a starting point in excess of 10 mr.

Corrective Steps Taken: Each individual has been instructed to re-zero their dosimeters at the beginning of each shift. They have also been instructed that the starting point shall not exceed 10 mr (see attached list for those having received instruction and date of instruction).

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Corrective Steps To Be Taken: Each film badged individual will be re-instructed during radiation safety annual training of this requirement. We have modified our Utilization and Dosimetry Log which contains a reminder of this requirement (see attachment).

Date of Full Compliance: Immediately upon acceptance of our amendment allowing the modification of our Utilization and Dosimetry Log.

- *4. Violation: No quarterly audit made on K. Furgeson for April, 1984. (After my return from the enforcement conference, I received timesheets indicating that Mr. Furgeson, near the end of April, was assigned to a permanent visual inspection at the Evanston, Wyoming high school and therefore, did not work as a radiographer from a point near the end of April until after the sale of the Evanston office to Western Stress. This may or may not void the write up. Please see attached copies of timesheets.)

Corrective Steps Taken: This was an isolated incident which with the addition of a full-time Radiation Safety Officer should not recur.

Corrective Steps To Be Taken: Have been completed.

Date of Full Compliance: Immediately

5. Violation: We had placed an unauthorized source in a Gulf Nuclear 20V camera (RG-SA-13).

Corrective Steps Taken: We have sold all Gulf Nuclear 20V cameras and disposed of all materials in the company.

Corrective Steps To Be Taken: We are amending our license to include the use of a Gulf Nuclear Model RG-SA-13 source in a Gulf Nuclear 20V camera. This should, in the event that we purchase another 20V camera, avoid this similar problem in the future.

Date of Full Compliance: Immediately upon acceptance of the amendment by the Nuclear Regulatory Commission.

6. Violation: A leak test for source serial number 8540 was due May 1, 1985 and not performed until June 1, 1985.

Corrective Steps Taken: The addition of a full-time Radiation Safety Officer will avoid this isolated incident in the future.

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Corrective Steps To Be Taken: The full-time Radiation Safety Officer has been instructed to comply with leak test requirements.

Date of Full Compliance: Immediately

7. Violation: Our Operating and Emergency Procedures require that a film badged individual make a written report as to why and what conditions caused an over-exposure in excess of 50 mr in any one day. Contrary to this requirement, some individuals had not made written statements and had excesses of 50 mr in one day.

Corrective Steps Taken: Each film badged individual has been instructed as to the necessity of completing the statement showing cause and conditions when they receive an excess of 50 mr in any one day. We have designed a new Utilization Inspection and Dosimetry Log which incorporates an area for explanation (see attachment).

Corrective Steps To Be Taken: The Utilization Inspection and Dosimetry Log will flag the individual to complete when in excess of 50 mr in any one day.

Date of Full Compliance: Immediately-plus upon acceptance of our amendment allowing us to use the new utilization format.

- *8. Violation: Quality Assurance Program on transport containers not fully maintained.

Corrective Steps Taken: We have written a Quality Assurance Program. We have on file certification of compliances for transport containers. We have submitted a letter to Mr. Charles McDonald, U.S. Nuclear Regulatory Commission, Washington, D. C., requesting registration of shipping containers used by us (see attachment).

Corrective Steps To Be Taken: All steps have been taken to avoid future violations.

Date of Full Compliance: Immediately

9. Violation: Technical over-exposure to Mitch Robinson due to not having previous exposure history.

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Corrective Steps Taken: On June 2, 1985, Mr. Robinson's previous employers involving radiation exposure were contacted by letter requesting previous exposure history. In contacting them also by telephone, we were given the amounts of 2,455 mr from NDE Services and M or zero from Spartan School of Aeronautics.

Corrective Steps To Be Taken: The addition of a full-time Radiation Safety Officer and the addition of the form referenced to in Item 1 above should avoid this isolated incident in the future.

Date of Full Compliance: Immediately

10. Violation: No previous exposure history on Mitch Robinson.

Corrective Steps Taken: Previous history requested from previous employers.

Corrective Steps To Be Taken: The addition of a full-time Radiation Safety Officer and the addition of the new form referenced in Item 1 above should avoid this problem in the future.

Date of Full Compliance: Immediately

11. Violation: Annual training of radiographers and radiographer assistants in 1985.

Corrective Steps Taken: All radiographers and radiographer assistants currently employed have received either initial or annual training and testing for radiation safety. We have also implemented or intend to implement a flagging system consisting of the form referenced in Item 1 above, as well as a scheduling board which will be used to schedule training for each individual.

Corrective Steps To Be Taken: See action taken above.

Date of Full Compliance: August 17, 1985

12. Violation: Failing to document the exposure to Mr. Jim Shupe's badge.

Corrective Steps Taken: To refamiliarize myself with the requirements of documenting an exposure to the body or the badge.

Corrective Steps To Be Taken: A job description describing the duties of the Radiation Safety Officer has been prepared which specifies the duties of investigation and documentation of all incidents involving radioactive materials (see attachment).

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Date of Full Compliance: Immediately

13. Violation: A record of disposal of source serial number 8016 was not maintained at our facility.

Corrective Steps Taken: Disposal record was requested for source serial number 8016, but as of July 17, 1985 has not been received.

Corrective Steps To Be Taken: A checklist has been prepared which incorporates a need for a disposal record when transferring materials from one company to another.

Date of Full Compliance: August 17, 1985

14. Violation: No dosimetry record for Mr. K. Furgeson was maintained for May, 1984. (You had considered dropping this during the enforcement conference that it was my belief that Mr. Furgeson had not worked with radioactive materials during May of 1984. At that time I stated that I would verify by timesheets that in fact this was the case. I have verified this and sent copies to Mr. Spitzberg. I am therefore asking that this be dropped.)

- 15A. Violation: Failure to maintain a copy of special material forms for each source from the supplier.

Corrective Steps Taken: We have requested a copy of each source model from the supplier.

Corrective Steps To Be Taken: We will maintain a file of certifications from the supplier.

Date of Full Compliance: July 29, 1985

- 15B. Violation: We were not using an over-pack container at the time of the audit with proper labeling.

Corrective Steps Taken: We have purchased certification number 6717 barrels from Gamma Industries. Also certification number 9039 barrel from Tech Ops. Each barrel has been labeled with proper transport index stickers and are now being used.

Corrective Steps To Be Taken: Each radiographer has been instructed that an over-pack will be used for transportation of each of our current cameras, except the Cobalt 60 camera which is already a certified number 9127 package.

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Date of Full Compliance: Immediately

- * It is my feeling that these items should be reviewed during a re-audit in an effort to determine whether or not they are in fact write-ups, as some information has been discovered that was not available during the first audit that may or may not answer the violation.

Mr. Everett, this together with the attachments completes my answers showing efforts made by management on management control system to correct and hopefully dismiss our suspension to work in NRC states. Please accept this in good faith and with total commitment from me to make all necessary corrections as outlined above.

Sincere regards,

MET-CHEM TESTING LABORATORIES


N. Wayne Hansen
Radiation Safety Officer

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Enclosures

cc: Mr. Blair Spitzberg
Mr. Richard L. Bangart
Mr. Tom Westerman