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JUN 6 1985

National Feedscrew and Machining, Inc.  
ATTN: Thomas McInnes  
Chief Radiographer  
577 Oberlin Road, S.W.  
Massillon, OH 44646

Re: Your Application Dated April 29, 1985, For An NRC License To Perform  
Industrial Radiography

Gentlemen:

In order to complete our review and issue you a license, you will need to submit additional information on and/or clarification of the following items:

Minimizing Exposure of Persons in the Event of an Accident--Emergency Procedures

An emergency situation is considered to exist whenever an abnormal event occurs, e.g., failure of a source to return to the safe storage position. Since it is not possible to list or specify all possible situations that would constitute an emergency, a general instruction is acceptable.

Radiography personnel should not attempt to perform operations involving retrieval or recovery of a source not in the shielded position unless they have had specific instruction and actual practice in retrieval operations with a dummy source. If you intend that radiographic personnel perform source retrieval or recovery, include in your training program a description of the instruction they will receive, including practice with a dummy source. In addition, include specific instructions for source retrieval in your operating and emergency procedures.

Unless personnel have had instruction and training in source retrieval or recovery, include the following instructions to personnel:

1. Establish and post the restricted area at the 2 milliroentgens per hour radiation level.
2. Maintain continuous surveillance of the restricted area until the situation is corrected.
3. Notify management or other appropriate persons.

In addition, describe the action to be taken by management.

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### Individuals Responsible For Radiation Safety Program

Paragraph 34.11(e) of 10 CFR Part 34 requires submission of a description of the overall organization pertaining to the radiography program, including specific delegations of authority and responsibility for operation of the program.

Include the following information in order to comply with the regulatory requirements:

1. A chart or description of the organization as it pertains to the radiography program specifying the name and title of each individual who has responsibility for management or supervision of the program.
2. The specific training and experience of each individual responsible for the day-to-day conduct of the program. Include the specific dates of training in radiation and radiation safety and where and by whom the training was conducted. Also, include the specifics of on-the-job training, including dates, name and address of the firm, equipment used, and the date on which each individual was initially designated a radiographer.

Any individual who is responsible for the day-to-day management of supervision of the radiography program should have had a minimum of 1 year of actual experience as a radiographer. No credit for experience will be given for the use of x-ray devices.

### Internal Inspection Program

Paragraph 34.11(d) of 10 CFR Part 34 requires an internal inspection system adequate to ensure that NRC regulations, license provisions, and your operating and emergency procedures are followed by radiographers and radiographers' assistants. You should submit a description of your internal inspection program that includes the specific matters to be considered in an inspection and a discussion of management action to be taken to correct any deficiencies. Your internal inspection program must cover each radiographer and radiographers' assistant at intervals not to exceed 3 months. Please include such a commitment in your application. Your inspection and preventative maintenance procedures should be revised to specify that inspection and preventative maintenance will be performed once every three (3) months (refer to Section 34.28(b) of the enclosed 10 CFR Part 34).

### Radiation Detection Instruments

Section 34.24 of 10 CFR Part 34 requires that a licensee maintain sufficient calibrated and operable survey meters to make physical radiation surveys as required by 10 CFR Parts 20 and 34, that the instruments have a range sufficient to measure 2 milliroentgens per hour through 1 roentgen per hour, and that the instruments be calibrated at intervals not to exceed 3 months and after each instrument repair.

Please state that you will have operable and calibrated survey meters with a range from 2 milliroentgens per hour through 1 roentgen per hour. Include a statement that the meters will (1) be calibrated so that the readings are  $\pm 20\%$  of the actual values of the range of the instrument, (2) have a calibration chart or graph showing the results of the calibration, the date of the last calibration, and the due date of the next calibration affixed to the survey meter, and (3) be calibrated at least every 3 months or after each servicing. Also state that calibration records will be kept for a minimum of two years after each calibration and identify by whom the instruments will be calibrated.

#### Radiation Surveys or Calculations

Please submit the radiation level calculations of areas adjacent to, above, and below the permanent facility. The radiation level in all directions including, the roof, should not exceed 2 milliroentgens per hour. These calculations should pertain to worst case exposures. If calculations on the roof exceed 2 milliroentgens per hour, please describe your surveillance procedures to prevent anyone from being on the roof area during exposure of your cobalt-60 source.

#### Radioactive Material

In your application you state that a Technical Operations Model A-411 sealed source would be used for instrument calibration. Please submit the name and model number of the container in which this source will be stored.

If you have any questions or require clarification on any of the information stated above, you may contact us at (312) 790-5625.

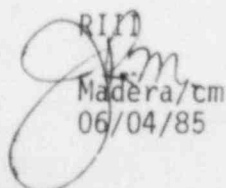
We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 78864.

Sincerely,

Original Signed By  
J.R. Madera  
Materials Licensing Section

#### Enclosures:

1. 10 CFR Part 34
2. Regulatory Guide 10.6, Rev. 1

RLM  
  
Madera/cm  
06/04/85