



OLD DOMINION FABRICATORS

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SEP 18 11:39
September 13, 1985

United States Nuclear Regulatory Commission
Region II
101 Marietta Street, N. W.
Atlanta, Georgia 30323

Attention: Mr. Kenneth P. Barr, Chief
Nuclear Materials Safety and Safeguards Branch
Division of Radiation Safety and Safeguards

Gentlemen:

In response to your letter dated August 23, 1985 concerning the apparent violations, Old Dominion Fabricators did not have a separate quality assurance program, although every aspect of the Q. A. program outlined in 10 CFR 71.12 (b) was being conducted through our procedures governing the use of radiographic equipment.

Old Dominion Fabricators did not have a Certificate of Compliance for Package Approval, nor did we submit one in writing prior to our first use of the package. The reasons for the violations are simple. Old Dominion Fabricators did not receive notification from any of our suppliers about how the changes would affect our license. We did receive the 10 CFR Part 71 in 1979, but it was filed with other notifications from the NRC. When I became Radiation Protection Officer in 1983, naturally I had no idea of the pending violations, especially after successfully passing several inspections by the NRC.

I have contacted Mr. Len L. Gordon of the Transportation Certification Branch Division of Fuel Cycle and Material Safety, NMSS. He has been very helpful in supplying me with the necessary information in preparing our Quality Assurance Program. After the Q. A. program is accepted, I will then apply for the Certificate of Compliance for Package Approval.

Old Dominion will do everything we can to avoid such violations in the future. Full compliance will be achieved as soon as possible. I do not foresee anything that would delay the approval of the Q. A. program, that I have submitted to the NRC on September 11, 1985. Should you have any questions concerning this letter, please contact me.

Very truly yours,

OLD DOMINION FABRICATORS

Raymond M. Martin

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Quality Control Manager
Radiation Protection Office

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