

ALLIED TESTING LABORATORIES, INC.

Testing & Inspection Services — Engineering Consultants

MASS. LIC. NO. CT1018
N.V.L.A.P. ACCREDITATION

115 ST. GEORGE ROAD

SPRINGFIELD, MASSACHUSETTS 01104

Telephone (413) 736-1846

November 1, 1996

Mr. Francis M. Costello, Chief
United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

RE: Inspection No. 030-22027/96-001 License No. 20-20747-01
Docket No. 030-22027

Dear Mr. Costello:

Investigation of the individuals film badge results of 1790 millirems in 1996 and 2720 millirems in 1995 indicates that during the course of many working days while he was on a project site and the gauge was in use on a part time basis at intervals throughout a workday, he selected to place the gauge within the cab of his pick-up truck along with the film badge adjacent to the gauge, which must be a direct cause of the higher exposure results shown on the Dosimetry reports, when in fact, he was not exposed to the radiation source.

When asked why he selected this method of job site storage and not methods he was instructed to follow ie, "Secured to the far corner of the pick up body and locked to prevent theft", he answered that he felt more secure in locking the gauge within the cab when he was not within view of the truck, but inadvertently never thought of the film badge exposure.

He was again instructed to follow the instructed NRC rules regarding transporting and storing on the project site.

We will monitor all future Dosimetry reports on this person to insure against any recurrence of this matter.

Reply to a Notice of Violation:

All gauges were furnished with a clearly distinguished "Shipping Paper".

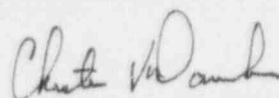
Personnel were again instructed that the Shipping Paper shall: See attached

Office personnel were also instructed to check on a daily basis that all gauge users have the Shipping Paper when any gauge is dispatched for use.

Full compliance was achieved as of October 7, 1996.

Respectfully submitted,
ALLIED TESTING LABORATORIES, INC.

**RETURN ORIGINAL TO
REGION I**

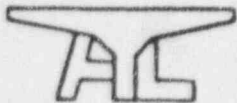

By: Chester V. Dawicki, President

Attached: Sample "Shipping Paper"

9612230367 961217
PDR ADOCK 03022027
C PDR

MEMBER: A.S.T.M. / A.C.I. / A.W.S. / A.S.N.T. / M.C.I.B. / I.A.C.R.S.

NOV - 7 1996



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SHIPPING PAPER

ONE CASE, R.Q, RADIOACTIVE MATERIAL,
SPECIAL FORM, N.O.W., 7, UN2974
Cs-137, 10 mCi
Am-241/Be, 50 mCi
RADIOACTIVE YELLOW 11 Label
Transport Index 0.4
USA DOT 7A, TYPE A PACKAGE

24 hour emergency contact phone #: (413) 568-8481 or (413) 734-1269

- 177.817(e) Shipping paper accessibility - accident or inspection.
A driver of a motor vehicle containing hazardous material shall insure that the shipping paper required by this section is readily available to, and recognizable by, authorities in the event of an accident or an inspection. Specifically, the driver and the carrier shall:
- (1) Clearly distinguish the shipping paper, if it is carried with other shipping papers or papers of any kind, by either distinctively tabbing it or having it appear first; and
 - (2) Store the shipping paper as follows:
 - (i) When the driver is at the vehicle controls, the shipping paper shall be: (A) within his immediate reach while he is restrained by the lab belt; and (B) either readily visible to a person entering the driver's compartment or in a holder which is mounted to the inside of the door on the driver's side of the vehicle.
 - (ii) When the driver is not at the vehicle controls, the shipping paper shall be: (A) in a holder which is mounted to the inside of the door on the driver's side of the vehicle, or (B) on the driver's seat in the vehicle.

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REGION I**