

MAY 9 1985

Docket No. : 030-20386
Control No.: 70173

Walashek Enterprises, Inc.
602 Launa Aloha Place
Kailua, Hawaii 96734

Attention: Mr. Timothy Carroll
General Manager

Gentlemen:

This is in reference to your application dated April 8, 1985 for a byproduct material license. In order to complete our review, we need the following additional information:

1. 10 CFR 34.31(a)(2) and 10 CFR 34.31(b)(1) require that certain documents be provided to individuals before they act as a radiographer or as a radiographer's assistant, respectively. You should submit a statement certifying that these documents will be provided to your personnel as required by 10 CFR 34.31.
2. 10 CFR 34.31(b)(3) requires that individuals complete a field examination involving responsible handling of radiographic equipment and survey instrumentation to be used by assistant radiographers under the personal supervision of radiographers.

You should submit a description of the field examination that you will use to verify that individuals have had sufficient training to operate equipment in the presence of a radiographer.

3. Item 8 on page 7 of the enclosed licensing guide specifies that the passing grades for radiographer and assistant radiographer examinations should be noted. Also, the reinstruction and retesting procedures to be used in areas in which individuals are found to be deficient should be described. You should submit this information.
4. Your emergency and operating procedures should include instructions to immediately notify the Radiation Safety Officer and Walashek Enterprises, Inc. management of any safety-related problems noted during the daily equipment inspection. Radiographers should not attempt to use defective equipment. (Refer to page 24 of the enclosed guide and to page 1 of Item 10B of your application dated April 8, 1985.) You should amend and resubmit this portion of your procedures.

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5. 10 CFR 20.101(b)(3) states that an individual's occupational exposure histories must be determined prior to allowing the employee to receive more than 1.25 rem in any calendar quarter. Section 2.6 on page 2 of Item 10A of your application did not reflect this requirement. You should submit a statement to verify that this requirement will be satisfied.
6. 10 CFR 34.27(a) requires that a description of the radiographic exposure device or storage container be included in the utilization log. Although your utilization log identifies the source used, it does not identify the device used. You should amend and resubmit the form to be used as your daily utilization log.
7. Page 7 of Item 10B of your application dated April 8, 1985 states that Industrial Nuclear Company should be notified if the initial leak test survey indicates radiation levels in excess of 0.5 mr/hr. your procedure should be amended to include notification of your Radiation Safety Officer. You should amend and resubmit this portion of your procedures.

We will continue the review of your request for a byproduct material license upon receipt of this information. You should submit your response within thirty (30) days from the date of this notice. Please reply in duplicate, and refer to Mail Control No. 70173.

Sincerely,

Beth A. Riedlinger
Health Physicist (Licensing)
Nuclear Materials Safety Section

Enclosure:

Proposed Revision 2 to Regulatory Guide 10.6