

NMSS:DBS  
Mail Control No. 60441

MAY 30 1985

Capital X-Ray Services, Inc.  
ATTN: George W. Johnson  
Radiation Safety Officer  
P. O. Box 3264  
Tulsa, Oklahoma 74101

Gentlemen:

This refers to your application dated October 24, 1984, to renew your license for use of sealed sources and devices for industrial radiography. We have completed review of your application and have the following comments and need for additional information. Certain sections from your license application dated June 29, 1979, which you have referenced for your current renewal request, are noted as are the sections of Regulatory Guide 10.6, Revision 2, (enclosed) which you may wish to refer to for further guidance.

1. With regard to your program for qualifying assistant radiographers, you need to modify Sections A.3 and A.4 on page 6(f), numbers 12 and 13, such that individuals must pass the qualifying examination before being allowed to perform as assistant radiographers. (8.1)
2. You need to modify Section A.5 on page 6(f), number 14, of your description of your training program for qualifying radiographers to add that you will verify that previously schooled and trained individuals will have had a minimum of 3 months (520 hours) of on-the-job training as an assistant radiographer for another licensee or 3 months of experience as a radiographer for another licensee before qualifying as a radiographer in your program. (8.2)
3. With regard to your program for quarterly internal inspection, please state that if a radiographer or radiographer's assistant does not perform radiography for a period that exceeds 3 months, the inspection should be carried out the first time that person engages in radiographic operations. (10.3)
4. To your Exposure Device Emergency Procedures on page 6(e), number 69, you should add that in the event that the source will not retract into its fully-shielded position, the radiographer or assistant shall establish and post the restricted area at the 2 milliroentgens per hour level. (10.4.7)
5. Please specify how you will dispose of licensed material (Item 11).

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Capital X-Ray Services, Inc.

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We shall continue review of your application upon receipt of the information and revisions requested above (in duplicate).

Sincerely,

Original Signed By  
C. L. Cain  
Nuclear Materials Safety Section

Enclosures:  
As stated