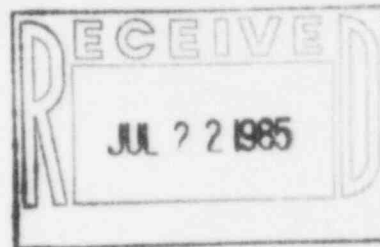




Western Stress, Inc.

TECHNICAL SERVICES & ENGINEERING
4321 DIRECTORS ROW • HOUSTON, TEXAS 77092 • (713) 681-7970



July 16, 1985

Mr. R. J. Everett, Acting Chief
Nuclear Materials Safety and Safeguards Branch
United States Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Gentlemen:

Re: Materials License Number 49-23490-01
Docket: 30-22259/85-01

This reply is in response to the specifics contained in the Notice of Violation enclosed with your letter dated June 24, 1985.

Our reply will follow the same subject and paragraph identification used in the Notice of Violation.

Item 1.a. Inspection of Radiographers:

1. Inspection of all radiographers has been made current and instructions have been given that the inspections shall be made at least once every 90 days, as stated, rather than once per quarter.
2. To avoid further violations, a follow-up system which consists of logging the inspection due date for each radiographer on a calendar type schedule board has been implemented.
3. Full compliance on this matter is complete.

Item 1.b. "Inspection, Utilization, and Dosimetry Log"

1. A "Safety Meeting" has been held with all technicians where they were given sample report forms and additional instructions on filling out all report forms and the importance of completing the forms correctly and completely. Instructions were given to review all previous reports and to complete any incomplete areas if the required information is documented on other existing reports.
2. To avoid further violations the following systems has been implemented:
 - a. The secretary will check the reports daily to assure they are filled out completely.

IC-096/85

8508200219 850805
REG4 LIC30
49-23490-01 PDR

Western Stress, Inc.

Mr. R. J. Everett, Acting Chief -2-

July 16, 1985

2. Cont'd:

- b. The RSO and/or the ARSO will review all reports at least once per week to assure they are completed correctly.

3. Full compliance on this matter is complete.

Item 2.a. Specification 7A Package Certification:

1. Certificate of Compliance for the Gamma Century SA has been obtained from Gamma Industries and is on file.

The Gulf Nuclear exposure devices are designed and built to the 7A specifications, but have not been subjected to the tests required by the 7A specification; therefore, no certifications are available. Certification of the required Type B overpack is on file.

Item 2.b. Shipment of Radioactive Material in Quantities Exceeding The Maximum A1 Quantity:

1. Technicians have received additional instruction and training on transportation of radioactive material.

Type B Shipping Packages (Overpacks) have been installed in the radiography vehicles for transporting the radioactive material to and from jobsites.

Item 2.c. Certification of Special Form Material:

1. A copy of IAEA Certificate of Competent Authority Certificate Number USA/0121/S Revision 3 (Radioactive Material Encapsulation) has been placed on file in the Evanston, WY office. Instructions have been given to maintain the file as required.

Item 2.d. Marking of Type A Packages:

1. The Gulf Nuclear exposure device is designed and manufactured to the Type A specifications but has not been subjected to the Type A Tests; therefore, it cannot be labeled, "USA DOT 7A Type A." "Radioactive Material" labels are installed on the devices.
2. Instructions have been given that these devices must be placed in Type B shipping packages for Transporting. (Refer to Item 2.b.)

To avoid further violations of Items 2.a, 2.b, 2.c and 2.d, the RSO and ARSO have been instructed to closely monitor these items during their review of reports and unannounced inspections of radiographers.

Western Stress, Inc.

Mr. R. J. Everett, Acting Chief -3-

July 16, 1985

Full compliance of matters covered under Item 2 has been achieved.

Item 3. Quality Assurance Program, Certificate of Compliance and Registration As User of NRC Approved Shipping Packages:

- a. Quality Assurance Program - A QA Program has been written and submitted to the NRC for approval. (Copy attached.)
- b. Certificate of Compliance - Copies of the Certificate of Compliance for the shipping packages have been obtained and are on file in the Evanston, WY office.
- c. Registration As User of NRC Approved Shipping Packages - A request for registration as a user of NRC approved shipping packages has been submitted to the NRC. (Copy attached.)

Full compliance with matter listed under Item 3 will be upon NRC approval of the submitted QA Program and request for registration as a user of NRC approved shipping packages.

Item 4. 10CFR20.102(a) Determination of Prior Dose

- a. To meet the requirements of 10CFR20.102(a), the attached Form is now in use by Western Stress, Inc.

It is a condition of employment that this form be filled out and signed by the employee before he/she is allowed entry into a restricted area.

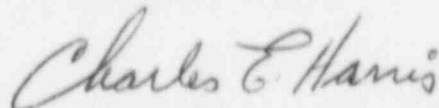
A copy of the form shall be maintained in the employee's personnel file.

- b. Full compliance on Item 4 is complete.

We trust that our response and corrective actions for the items listed meet with your approval.

Should you have any questions or if you require more information, please contact me.

Yours very truly,



Charles E. Harris
QA Manager/Corp. RSO
Western Stress, Inc.

CEH:jc

Attachments

Western Stress, Inc.

PROFESSIONAL ON-SITE HEAT TREATING
4321 DIRECTORS ROW • HOUSTON, TEXAS 77062 • (713) 681-7970

July 15, 1985

Director
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

RE: Materials License Number 49-23490-01
Western Stress, Inc.
108 Parkview Road
Evanston, Wyoming 82930

Per the requirements of 10CFR71, Subpart H we submit a copy of our Quality Assurance Program for your approval.

We also request that Western Stress, Inc. be registered as a user and shipper of the following radioactive materials and packages.

Sealed Sources

<u>Manufacturer</u>	<u>Model</u>
1. Gulf Nuclear	RG-13
2. Gulf Nuclear	RGSA-13
3. Gamma Industries	A-8-A
4. Technical Operations	A-424-9
5. Technical Operations	90003
6. Technical Operations	A-58101-8
7. Technical Operations	A-424-14
8. Technical Operations	848

Exposure Devices

<u>Manufacturer</u>	<u>Model</u>
1. Gulf Nuclear	20V
2. Gulf Nuclear	40V
3. Gamma Industries	Century SA
4. Gamma Industries	Gammatron 100-A
5. Technical Operations	660
6. Technical Operations	900
7. Technical Operations	920
8. Technical Operations	616
9. Technical Operations	680

~~8508080016~~ 4pp

Western Stress, Inc.

Director/U.S. Nuclear
Regulatory Commission

-2-

July 15, 1985

Source Changers

<u>Manufacturer</u>	<u>Model</u>
1. Gulf Nuclear	U-110A
2. Gamma Industries	C-10
3. Technical Operations	650
4. Technical Operations	850
5. Technical Operations	771
6. Technical Operations	488

Packaging

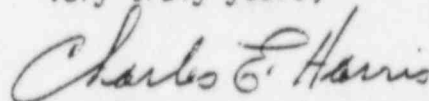
<u>Manufacturer</u>	<u>Model</u>
1. Gulf Nuclear	6717-B
2. Gamma Industries	6717-B
3. Technical Operations	715 Drum (Overpack)

Attached is a copy of Western Stress, Inc's. Quality Assurance Program, Gamma Industries Certificate of Compliance for the Gamma Century SA and Certificate Numbers USA/6717/B(U)T (Revision 1) and USA/0121/S (Revision 3).

Also attached is a check in the amount of \$150.00 for the Quality Assurance Program, Evaluation Application Fee.

Thank you for your prompt attention to this matter.

Very truly yours,



Charles E. Harris
Corporate RSO
Western Stress, Inc.
4321 Directors Row
Houston, Texas 77092

CEH:baw

Attachment

Western Stress, Inc.

10CFR71 QA PROGRAM

FOR

WESTERN STRESS, INC.

NRC LICENSE NUMBER 49-23490-01

1. Organization:

Western Stress, Inc. (WSI) has the final responsibility for the Quality Assurance Program for Part 71 Requirements. Design and fabrication of radioactive material shipping packages shall not be conducted under this Quality Assurance Program. The QA/QC Manager is responsible for implementing the Quality Assurance Program.

The Radiation Safety Officer (RSO) or Assistant Radiation Safety Officer (ARSO) is responsible for overall administration of the program, training and certification, document control, and auditing.

The Radiographers are responsible for handling, storing, shipping, inspection, testing, operating status and record keeping.

2. Quality Assurance Program:

The management of WSI establishes and implements this Quality Assurance Program. Training for all QA functions, prior to engagement in these functions, is required according to written instructions. QA Program revisions will be made with management approval.

The RSO or ARSO shall assure that all radioactive material shipping packages are designed and manufactured under a Quality Assurance Program approved by the Nuclear Regulatory Commission for all packages designed or fabricated after 1 July 1978. This requirement is satisfied by receiving a certification to this effect from the manufacturer.

3. Document Control:

All documents related to a specific shipping package will be controlled through the use of instructions in the Radiation Safety Manual, and all document changes will be approved by management.

The RSO shall insure that all QA functions are conducted in accordance with the latest applicable documents.

Western Stress, Inc.

-2-

4. Handling Storage and Shipping:

Written safety instructions concerning the handling, storage and shipping of packages for special form radioactive material will be followed. Shipments will not be made unless all tests, certifications, acceptances, and final inspections have been completed according to instructions in the Radiation Safety Manual.

Radiography personnel shall perform the critical handling, storage and shipping operations.

5. Inspection, Testing and Operating Status:

Inspection, testing and operating status of packages for special form radioactive material will be indicated and controlled by the Radiation Safety Manual. Status will be indicated by tag, label, marking or log entry. Status of nonconforming parts or packages will be positively maintained by written instructions.

Radiography personnel shall perform the regulatory required inspections and tests in accordance with written instructions. The RSO shall ensure that these functions are performed.

6. Quality Assurance Records:

Records of package approvals (including references and drawings), inspections, tests, operating logs, audit results, personnel training and qualifications and records of shipments will be maintained. Descriptions of equipment and written instructions will also be maintained.

These records will be maintained in accordance with written instructions. The records will be identifiable and retrievable. A list of these records, with their storage locations, will be maintained by the RSO.

7. Audits:

Established schedules of audits of the Quality Assurance Program will be performed using written check lists. Results of audits will be maintained. Audit reports will be evaluated and deficient areas corrected. The audits will be dependent on the safety significance of the activity being audited, but each activity will be audited at least once per year. Audit reports will be maintained as part of the quality assurance records. Members of the audit team shall have no responsibility in the activity being audited.