

## MEMORANDUM

TO: WILLIAM H. SPELL, ADMINISTRATOR  
JAMES SANFORD, PROGRAM MANAGER  
SAMI AOUAD, RPS  
RUSSELL CLARK, RPS

COPY TO: ✓ STEVE BAGGETT, NRC  
JAMES MYERS, NRC

FROM: MICHAEL HENRY *me*

SUBJECT: SPEC 150

DATE: OCTOBER 25, 1996

The attached correspondence from Gulf Coast Inspection was received this morning. Russell Clark and I were made aware of the problems during an inspection last week. However, we had no idea that Mr. Olivier was contemplating an exemption request.

Most of the problems were discussed in detail with Donny Dicharry while Sami and I were touring the SPEC plant earlier this week. Modifications have already been made as a result of most of the complaints, but I'm not sure everything has been taken care of.

Advise if I can help.

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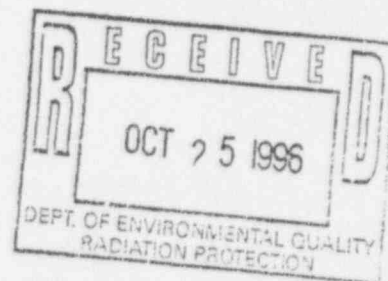
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SP-A6-12

**Gulf Coast**  
**INSPECTION**  
1-800-317-5097



October 18, 1996

State of Louisiana  
Department of Environmental Quality  
Radiation Protection Division  
PO Box 82135  
Baton Rouge, Louisiana 70884-2135

Attention: Mr. Mike Henry

Re: Louisiana License No. LA-7396-LO1

Dear Mr. Henry,

In December of 1995, Gulf Coast Inspection began purchasing SPEC 150 crank-out devices in order to meet the requirements of 10CFR Part 34 and ANSI N432-1980. We have purchased 16 units at a considerable cost. Not only has it cost us in monetary terms, but we had to "downsize" our marketing division to the point that Gulf Coast Inspection no longer employs a Sales Person. Not only have three employees lost their jobs, but Gulf Coast loses a competitive advantage, just so that we can comply with regulations. We knew that the new requirements would be bad for business, but now we have enough experience with the devices that meet requirements to conclude that this unit also compromises the safety of our employees.

Since becoming an employee of Gulf Coast in August 1996, Kirk W. Gros, Company RSO has had to replace six lock modules in SPEC 150's. That is six malfunctioning devices out of sixteen. On September 10, 1996 unit 373 had a lock module replaced. Then, 9/11/96 unit 235 was replaced, on 9/12/96 unit 240 was replaced, on 9/16/96 unit 114 was replaced, on 10/14/96 unit 259 was replaced, on 10/15/96 unit 241 was replaced. After his first series of audits, Kirk identified four malfunctioning units. Two units had broken lock plungers where radiographers could just remove the lock plunger by hand. One unit had to be taken out of the field because the control assembly and key was stuck and could not be removed. And a fourth unit would only function once the crank handle was jiggled back and forth several times. In the second week of October, we had two more malfunctions. One where the control adapter and key again could not be removed, and another where the lock plunger was broken. Each time that a unit has to be removed from the field, Gulf Coast has employees who cannot work until the unit is repaired. Spec has loaned us equipment to change out lock modules ourselves when the control adapter and key could be removed. That entails Kirk to travel to Spec (approx. 55 miles), pick up replacement equipment and tools, travel out to the job site (sometimes in New Iberia, Morgan City, or Lafayette), change the defective equipment, then return the equipment to Spec.

The economic impact, (loss of jobs, idle crews, RSO doing repairs taking away from normal duties, and cost of replacing units) is a secondary concern. The Safety of Gulf Coast Radiographers is our **First** priority. The Spec 150 is a very sophisticated unit which meets ANSI Standards, but does not provide a safer radiography device. In fact, it compromises safety for our radiographers. Radiographers have had to put tape on the lock plunger to keep from losing it. But, taping the lock plunger down defeats the lock. Now, there is no way for the radiographer to lock the device and secure the source. The customer must have the radiography performed, and the job must be finished. Fortunately, our radiographers have worked safely because they depend on a survey meter and not a sophisticated, self locking device which is supposed to be automatic, but has proven unreliable.

**Quality Service • Quality People**

# Gulf Coast

## INSPECTION

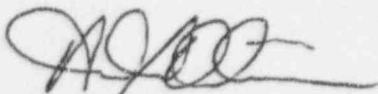
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Therefore, Gulf Coast Inspection is requesting relief from the requirements of the 10 CFR Part 34 and ANSI N432-1980. The requirements imposed upon us has placed our radiographers more at risk than ever. Gulf Coast is requesting a temporary exemption from the requirements requiring a self locking device and permission to deploy our Spec 2T units. The ANSI requirements were imposed on us without any proof that the Spec 150 unit is safer than the Spec 2T. We are asking for permission to use the Spec 2T until the Spec 150 has been revised and **proven** to be a safer device.

When the Spec 150 lock module is malfunctioning, there may be little control in securing the camera. At least with the Spec 2T we can manually control the locking of the device, and through use of the survey meter, continue to work safely in Gamma Radiography.

If you have any questions, please feel free to call me at 1-800-317-5097.

Sincerely,



Andre' Olivier  
President  
Gulf Coast Inspection

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