

~~CONSOLIDATED~~

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X-RAY SERVICE CORPORATION
NEW JERSEY DIVISION

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June 7, 1985

United States
Nuclear Regulatory Commission
Region 1
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. John D. Kinneman, Chief
Nuclear Materials Section A
Nuclear Materials Safety & Safeguards Branch
Division of Radiation Safety & Safeguards

Re: License No. 29-21452-01
Inspection No. 85-01
Notice of Violation-Docket No. 030-20787

Gentlemen:

Following is Consolidated X-Ray Service Corporation's
response to your letter dated May 9, 1985:

Violation A: Consolidated X-Ray Service Corporation contends
there was no violation of the requirements of 10 CFR 34.22(a),
that during radiographic operations the sealed source assembly
shall be secured in the shielded position each time the source
is returned to that position.

During the radiographic operations January 4, 1985, the radio-
graphic exposure device was under the direct surveillance of
the radiographer at all times while he was changing film
cassettes. No unauthorized personnel could have entered the
restricted area without the knowledge of the radiographer.
It is the contention of Consolidated X-Ray Service Corporation
that this meets the requirements of secure in the context of
regulation 10 CFR 34.22(a).

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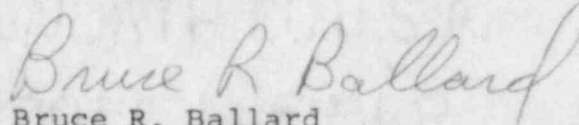
Violation B: Failure of a radiographer or radiographer's assistant to survey the exposure device and full length of the source guide tube after each exposure is contrary to Consolidated X-Ray Service Corporation Operating and Emergency Procedure for use of Radioactive By-Product Material, Section 1, Para. D.

Corrective Steps: 1) The radiographer in violation was removed from the field site and instructed by a Radiation Safety Officer in the proper survey procedures. 2) All Consolidated X-Ray Service Corporation radiographers and radiographer's assistants have received additional instructions in the proper survey procedures. More frequent field site inspections will be conducted by Consolidated X-Ray Service Corporation Radiation Safety Officers to ensure compliance by employees. 3) Date of full compliance 5/30/85.

Violation C Corrective Steps: 1) All Consolidated X-Ray Service Corporation employees who may transport licensed material will be re-instructed not to transport or place for transport any licensed material unless proper shipping papers are completed and accompany the licensed material. 2) Consolidated X-Ray Service Corporation has placed proper shipping paper forms in a conspicuous place, outside the offices of two Radiation Safety Officers and near the exit employees would use to place licensed material in transport vehicles. Consolidated X-Ray Service Corporation Radiation Safety Officers will physically check that all shipments of licensed material are accompanied by the proper shipping papers. 3) Date of full compliance 5/30/85.

Yours truly,

CONSOLIDATED X-RAY SERVICE CORP.



Bruce R. Ballard
Operations Manager
Radiation Safety Officer

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