

NMSS:DBS
Mail Control No. 17663

APR 16 1985

Panhandle Eastern Pipeline Company
ATTN: K. F. L. Dohrman
10890 Benson, Box #12330
Overland Park, Kansas 66212

Gentlemen:

This refers to your application dated June 4, 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. Noted in parentheses 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 training and qualifying radiographers and radiographer's assistants, please list the names and qualifications of the individuals who will conduct the training program outlined in your application that is in addition to the outside training schools specified (Item 8, No. 7). Also, you need to state that your training program will include instructions in "Fundamentals of Radiation Safety" as outlined in Part 34, Appendix A (Item 8, No. 2). Finally, in order to qualify newly-hired radiographic personnel as radiographers you need to commit to giving them on-the-job training under the supervision of a radiographer for a minimum of 3 months full-time equivalent. This means approximately 13 weeks or 520 hours of actual work performing radiography and associated operations (Item 8.2).
2. For survey instrument calibration, in addition to quarterly calibration, you need to state that calibration will be performed after servicing or repair, and that calibration records will be kept for a minimum of 2 years (Item 10.2).
3. With regard to your program for quarterly internal inspections, please clarify that periodic (3-month) internal inspections will be performed for each radiographer and radiographer's assistant. Also, 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 (Item 10.3).

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4. In your description of use of direct reading pocket dosimeters, you need to state that personnel will record the dosimeter reading at both the beginning and end of each day (Item 10.4.5).
5. Concerning your Section 9 on transporting of sealed sources, the placard stating "Caution Radioactive Material" is not the approved DOT placard specified in 49 CFR 172.556. The sign you have referenced should be used when the vehicle is the storage location of sealed sources. When in transit, you should state that the vehicle will be placarded on each side, the front, and the back with the appropriate DOT placard which states "Radioactive" (Item 10.4.6).
6. Please specify how you will dispose of licensed material (Item 11).

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

C. L. Cain
Nuclear Materials Safety Section

Enclosures:
As stated