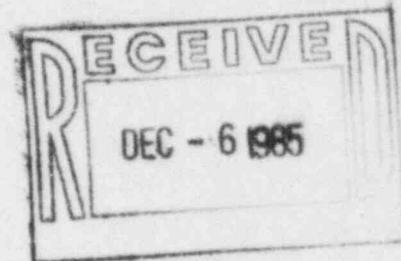


INSPECTION HOUSTON LABORATORIES, INC.

12300 Zavalla / Houston, Texas 77085 / (713) 729-4515

December 2, 1985

R.E. Hall, Chief
Radiological & Safeguards
Programs Branch
U.S. N.R.C., Region IV
611 Ryan Plaza Dr., Suite 1000
Arlington, TX 76011



Re: Docket: 030-20313
License: 42-23150-01

Dear Mr. Hall:

This is in response to the above referenced correspondence from your office, dated November 15, 1985. The item letters below correspond directly to those noted in the "Notice of Violation" (Appendix A to the above referenced correspondence).

- a. Our investigation of this violation revealed that there was a misinterpretation of our operating procedures by radiographic personnel. Radiographers indicated that they thought the carrying of survey meters "in-hand" and area surveying after every exposure only applied to radiography involving "Crank-out" type exposure devices. In that this violation involved a pipeline type device, we can understand how it occurred. We have had a discussion with all radiographic personnel and clarified the misinterpretation. All personnel now realize that survey meters are to be carried "in-hand" during all radiographic operations.
- b. The responsibility for training and testing personnel is vested in our Radiation Safety Officer (R.S.O.). The lack of proper testing, in the two noted cases, was during the period immediately prior to our previous R.S.O. quitting. Prior to this incident he had always ensured that all training and testing requirements were met. However, in these cases, knowing that he was going to leave, we believe that he simply failed to ensure that all personnel were properly tested. Since we now have a new R.S.O. (Bill Ausburne) we do not anticipate this recurring in the future.
- c. The reason that the referenced parts of Title 10 of the Code of Federal Regulations were not available on the temporary, lay-barge job-site is that we were unaware of exactly where the offshore jurisdiction changed from Texas to N.R.C. However, we would like it noted that Parts 21, 22 and 31 of the Texas Regulations for Control of Radiation were available on the job-site. Further, we would like it noted that we were under the impression that we were still operating in Texas' waters. This is the reason we questioned the inspector about it (as he noted in his Exit Interview). Our research into this question revealed that Texas' jurisdiction extends to 3 marine leagues offshore. Further, we found that a "league" could vary from 2.42 to 4.6 statute miles. This would translate to between 7.26 and 13.8 miles that Texas' jurisdiction would extend offshore.

For this reason we would like to ask that you please clarify this for us.

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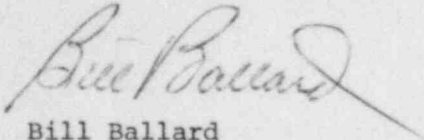
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In the interim we will use an approximation of 3 statute miles per league and will consider a distance of up to 9 miles offshore as Texas' jurisdiction.

We hope this sufficiently addresses the violations noted. Our program is in compliance as of this date and we will make every effort to ensure that full compliance is maintained in the future.

Should you have additional questions, or need further clarification please feel free to contact my office.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "Bill Ballard".

Bill Ballard

BRB:dc