

POGUE INDUSTRIES INCORPORATED

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29 August 1985

U.S. Nuclear Regulatory Commission, Region III
Materials Licensing Section, Bldg. #4
799 Roosevelt Road
Glen Ellyn, Illinois 60137

ATTENTION: Mr. John Madera

SUBJECT: Application for Material License,
Control Number 379368

Dear Mr. Madera:

The following pertains to our telephone conversation of 27 August 1985. These concern Items #1 through #4 as outline.

Item # 1: Organizational Structure

The following is the list of officers and their position within the Corporate Organizational Structure:

President:	Steven W. Pogue
Vice-President:	Nolia M. Pogue (No Radiation Experience)
Radiation Safety Officer:	Steven W. Pogue
Assistant Radiation Safety Officer:	Terry Bruce
Quality Assurance Manager:	Glenn A. Bengert

Item # 2: Radiation Training Course Outline did not include Inspection and Maintenance performed by the Radiographers or Case Histories of Radiography Accidents.

Correction: Procedure 10.7.B Page 8 of 11

Change - sub paragraph (1) part 1) to the Approximate time for this presentation is two (2) hours.

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Add - sub paragraph (j) time ½ hour
Inspection and Maintenance performed by the
radiographers.

Add - sub paragraph (k) Page 9 of 11 time (1) hour
Case histories of radiography accidents.

Item # 3: On the job training under supervision of Radiographer

Correction: Procedure 10.7.B Page 5 of 11
Change - Paragraph 3.3 to read

Radiographer - After ninety (90) days on the job
training in radiography while under the personal
supervision of a radiographer, the employee becomes
eligible for advancement to the position of
Radiographer, upon successful completion of the
following training procedure:

Item # 4: Responsible person for Instructor

Correction: Procedure 10.7.B Page 5 of 11

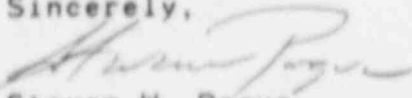
Change - Paragraph 3.2.2.2 sub paragraph 1) to read:

The Trainee shall be instructed in the use of
radiography equipment by using the manufacturer's
operations manuals as a text for his instruction.
This instruction shall be given by the Assistant
Radiation Safety Officer, Radiation Safety Officer,
Radiation Safety Monitor, or Experienced Radiographer
(As a Radiographer with one (1) year minimum
experience).

We appreciate your efforts in the review of our license application.
We hope these corrections will clear up our discrepancies in order for
us to meet the regulations. Should you have any questions, need
additional information or have any suggestions please feel free to
contact me at (314) 892-4934.

Thank you for your quick response.

Sincerely,



Steven W. Pogue

SP/CG

Enclosures

- 1) The Trainee shall be instructed in the use of radiography equipment by using the manufacturer's operations manuals as as text for his instruction. This instruction shall be given by the Assistant Radiation Safety Officer, Radiation Safety Officer, Radiation Safety Monitor, or Experienced Radiographer (As a Radiographer with one (1) year minimum experience).
- 2) The Trainee shall be assigned to a Radiographic inspection team and he will observe the operations, procedures, and techniques used by the team. He shall not act in the capacity of handling or using radioactive sources during this 16 hour training period.

3.2.2.3 After completion of 2 weeks of on-the-job training and 16 hours of formal training, the trainee will be eligible for a 25 question written examination followed by an oral review. In addition, he must satisfactorily demonstrate his competence to use, under the instructions of the Radiographer, the radiographic exposure devices, radiation survey instruments, sealed sources, and related handling tools which will be used in performing his duties as an Assistant Radiographer.

3.2.2.4 Upon successful completion of the written examination, oral review, and demonstration, the Radiographer Trainee becomes eligible for certification as an Assistant Radiographer.

3.3 Radiographer - After ninety (90) days on the job training in radiography while under the personal supervision of a radiographer, the employee becomes eligible for advancement to the position of Radiographer, upon successful completion of the following training procedure:

3.3.1 Twenty (20) hours duration of instruction and demonstration is given to all Assistants before they can become a Radiographer. Formal instruction shall be administered by the Assistant Radiation Safety

(g) Radiation Detection and Measurement

- 1) Purpose of Dosimetry
- 2) Dosimeters
- 3) Film Badges
- 4) Survey Techniques
- 5) Survey Techniques
- 6) Equipment Calibration
- 7) Operations
- 8) Limitations

A general description of dosimetry, monitoring, devices, and techniques. The approximate time for this presentation is two (2) hours.

(h) Radiographic Equipment

- 1) Exposure Devices
- 2) Storage Containers
- 3) Remote handling equipment
- 4) Operation and control of X-Ray equipment (if applicable)

This is a description and demonstration of devices. The approximate time for this presentation is one and one-half (1 ½) hours.

(i) The requirements of Federal or Agreement States Regulations.

- 1) This is on the interpretation of pertinent regulations. The approximate time for this presentation is two (2) hours.

(j) Inspection and maintenance performed by the radiographers.

- 1) Description of inspection for obvious defects in exposure devices, storage container and remote handling equipment. Approximate time for this presentation is one-half (½) hour.

(k) Case histories of radiography accidents.

1. Interpretation and description of radiography accidents and their prevention. Approximate time for this presentation is one (1) hour.

3.3.2 Upon completion of the twenty (20) hours of instruction and demonstration and examination, the Assistant is eligible for certification as a Radiographer.

3.3.3 The mandatory guidelines for conducting the training by PII for the instructor will be as follows:

- (a) The course of instruction will be completed within ten working days. In the event the course is not completed within this time frame, it will be necessary to begin the instruction over again.
- (b) Conduct the course in the sequence outlined in Procedure 10.7.B Training Procedure, Paragraph 3.2.
- (c) Each subject in the outline will be covered in the scope specified.
- (d) Each item in the outlined with be covered to the extent specified.

3.4 Radiographer - Radiographers shall complete a refresher training/examination every three (3) years in areas of training initially required for certification and/or when deemed necessary by the Radiation Safety Officer because of changes in commission and/or Agreement States Regulations, equipment, and Operating and Emergency Ssystem Procedures of PII. Upon sastisfactory completion of the refresher examination, the Radiographer is eligible for recertification.

3.4.1 This is a formal refresher course and re-examination and is is addition to the quality training sessions conducted by the Radiation Safety Monitor.

3.5 Radiation Safety Monitor - Training requirements for Radiation Safety Monitors include, but are not limited to the following:

- 3.5.1 The satisfactory completion of requirements in accordance with Procedure 10.7.A "Qualification and Certification" are required prior to issuance of certification as a Radiation Safety Monitor by the Radiation Safety Officer.
- 3.5.2 Satisfactory completion of training covering general and specific are as follows:
 - (a) Principles of Radiation Safety
 - (b) Operating and Emergency Procedures
 - (c) State and Federal Regulations
 - (d) Conducting and evaluating examinations
 - (e) Expected radiation levels during various operations
 - (f) Detection of Equipment defects or malfunctions
 - (g) Identification of hazardous situations
- 3.5.3 Successful completion of the written examination, oral review, and demonstration, the employee becomes eligible for certification as a Radiation Safety Monitor.
- 3.5.4 Radiation Safety Monitors shall complete a refresher training/examination every three (3) years in areas of training initially required for certification and/or when deemed necessary by the Radiation Safety Officer because of changes in Commission and/or Agreement State Regulations, equipment, and Operating and Emergency Procedures of PII. Upon satisfactory completion of the refresher examination the Radiation Safety Monitor is eligible for recertification.
- 3.6 Experienced Radiographic Personnel - Radiographic personnel with previous experience, hired by PII must met the following requirements:
 - 3.6.1 The previous employer(s) is contacted by telephone, followed by written confirmation for the following:
 - (a) Confirmation of employment
 - (b) Length of time employed

- (c) Position and/or title held while employed
- (d) Record of radiation safety training of experience and rating held relative to position or placement by PII.

3.6.1.1 After confirmation of employment information, the experienced personnel are issued a copy of the field manual of Operating and Emergency Procedures to study and review.

3.6.2 Radiographic personnel with previous experience are given informative instructions of PII Operating and Emergency Procedures, instruments, sources, devices and equipment used in the source of performing their duties in Radiographic Inspection.

3.6.2.1 The approximate time for this instruction, familiarization, and examinations is eight (8) hours.

3.6.2.2 This instruction is given by Assistant Radiation Safety Officer, Radiation Safety Officer, or Radiation Safety Monitor.

3.6.3 Radiographic personnel with previous experience shall be required to pass the examinations that are applicable to the position being filled. The examinations shall apply in the same manner as outlined in the Qualification and Certification Procedure 10.7.A.

3.6.3.1 Upon completion of these requirements the radiographic personnel with previous experience will be eligible for certification to the level for which they are qualified.

CONVERSATION RECORD

TIME

4:30

DATE

8/27/85

TYPE

☐ VISIT☐ CONFERENCE☒ TELEPHONE☐ INCOMING☒ OUTGOING

ROUTING

NAME/SYMBOL

INT

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

ORGANIZATION (Office, dept., bureau, etc.)

TELEPHONE NO.

Steven W. Pogue, Pres. Pogue Industries, Inc.

314/892-4934

SUBJECT

Deficiency / New license application
(Radiography)

SUMMARY

① Organizational Structure: Name the individuals in charge of program by title.

example: President; V.P.; RSO; and assistant RSO.

② Radiographer Training - course outline should include the Topics: ① Case Histories of Radiographic accidents. ② Inspection and Maintenance performed by Radiographers. Appendix Part 34.

③ O.J.T. program - State that a trainee prior to becoming a cert. Radiographer will have 90 days of supervised O.J.T.

④ Individual who will conduct training course: Name the individual and his qualifications - Radiographer for at least 1yr.

ACTION REQUIRED

Respond in writing within 30 days using
Control # 379368.

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE

ACTION TAKEN

J.R. Made

SIGNATURE

TITLE

DATE