

MAY 29 1985

Docket No. : 030-20969
License No.: 50-23363-01
Control No.: 70184

Ultra Technology, Inc.
509 West Third Avenue
Anchorage, Alaska 99503

Attention: Donald S. Heiken
Radiation Safety Officer

Gentlemen:

This is in reference to your letter dated April 20, 1985 to amend your byproduct material license. In order to complete our review, we need the following additional information:

1. Pages 4 and 5 of Attachment E of your Radiation Safety Manual states that the Radiation Safety Officer may appoint instructors for training and retraining of radiographers.

Page 10 of the enclosed licensing guide states that, "Individuals who provide instruction in the use of equipment should be qualified radiographers with at least 1 year of experience in performing radiography. The name of each individual who will conduct training and the topics in which they will provide instruction should be specified".

You should amend and resubmit pages 4 and 5 of Attachment E to incorporate the criteria stated in the licensing guide.

2. Page 5 of Attachment H of your Radiation Safety Manual states that the senior radiographer may "appoint a Deputy to act on his behalf during brief absences from the field site". The duties of the senior radiographer include radiation safety responsibilities.

Page 6 of the enclosed licensing guide states that, "Any individual who is responsible for the day-to-day management or supervision of the radiography program should have had a minimum of 1 year of actual experience as a radiographer". Also, the names and titles of these individuals should be submitted with your amendment request.

You should amend and resubmit page 5 of Attachment H.

8603210241 851015
REG5 LIC30
50-23363-01 PDR

OFFICE	RV <i>BAR</i>					
SURNAME	Riedlinger:fr					
DATE	5/29/85					

MAY 25 1985

3. Page 4 of Attachment E of your Radiation Safety Manual states that other training courses approved by the Commission may be substituted, either totally or in part, for the Ultra Technology, Inc. training program.

You should note that other courses which have been approved by the Commission will still need to be supplemented by your company - specific training which describes your operating and emergency procedures and equipment use. All of the appropriate exams should be administered to be consistent with your training procedures and to assure compliance with 10 CFR 34.31. Partial training from other licensee training courses cannot be accepted, as it would not be clear which topics were covered and which were not.

You should amend and resubmit page 4 of Attachment E.

4. We believe that there is an error on page 4 of Attachment E of your Radiation Safety Manual. We believe that the last sentence on that page should read, "Personnel who are graduates of Weld-236 will be evaluated as per b) above". Your procedure specifies that credit can be given only for Chapters 2 through 7 of your training course. Ultra Technology is responsible for all other training and for administering all of the appropriate examinations.

You should amend and resubmit this portion of your procedures.

5. Item e.1. of page 3 of Chapter 11 of your Radiation Safety Manual describes the radiation survey to be conducted at the completion of an exposure.

10 CFR 34.43 requires that the entire circumference of the radiographic exposure device be surveyed. It also requires that a record of the survey be maintained when the survey is the last one made prior to locking the radiographic exposure device and ending direct surveillance of the operation.

You should amend and resubmit this portion of your procedures to reference the requirements of 10 CFR 34.43.

We will continue the review of your amendment request upon receipt of this information. You should submit your response within thirty (30) days from the date of this notice. Please reply in duplicate, and refer to Mail Control No. 70184.

Sincerely,

Beth A. Riedlinger
Health Physicist (Licensing)
Nuclear Materials Safety Section

Enclosure:

Proposed Revision 2 to Regulatory Guide 10.6