

MAR 31 1988

Docket: 30-29019/87-01
License: 49-26808-01
EA 87-197

High Mountain Inspection Service, Inc.
ATTN: Bill R. Fraser, President
P. O. Box 656
Mills, Wyoming 82644

Gentlemen:

Thank you for your letter dated January 4, 1988, in response to our letter and the attached Notice of Violation dated November 30, 1987.

Your reply of January 4, 1988, had deficiencies in some of your explanations of the violations. These deficiencies are the lack of specific responses for items (1), (2), (3), and (4) as required by the last paragraph on page 3 of the Notice of Violation. The listing below specifies which violations need further responses from you. Please provide this information to this office within 30 days of the date of this letter.

Violation A. - (1), (3)
Violation B. - (1), (3) (see the restatement of this violation below)
Violation C. - (1), (3)
Violation D. - (1), (3)
Violation E.2 - (3)

Your reply of January 4, 1988, stated that your company had never received Cs-137 or Co-60 sources. Consequently, the following restatement of Violation B. omits the radioisotopes Cs-137 and Co-60, which were included in the original citation.

B. 10 CFR 20.401(b) requires, in part, that each licensee shall maintain records in the same units used in this part, showing the results of surveys required by 10 CFR 20.205(c).

Contrary to the above, on August 31, 1987, the NRC inspector determined that incoming package survey records were not maintained. These incoming packages had contained radiographic sources of Ir-192. The licensee affirmed that surveys were being performed according to 10 CFR 20.205(c)(1), but records were not kept of these surveys of incoming packages for the period April 2, 1986, to August 31, 1987.

This is a Severity Level IV violation (Supplement IV).

RIV:NMIS
WLHolley;ap
3/21/88

C:NMIS
DAPowers
3/29/88

C:NMEPB
WLFisher
3/30/88

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High Mountain Inspection Service, Inc. -2-

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
WILLIAM L. FISHER

William L. Fisher, Chief
Nuclear Materials and Emergency
Preparedness Branch

cc:
Wyoming Radiation Control Program Director

bcc w/ltr dtd 1/4/88 from licensee:

DMB - IE-07

RD Martin

RL Bangart

RE Hall

WL Fisher

DA Powers

W Holley

RIV Files

NMEPB

RSTS Operator

OE:ES File

OE:EA File

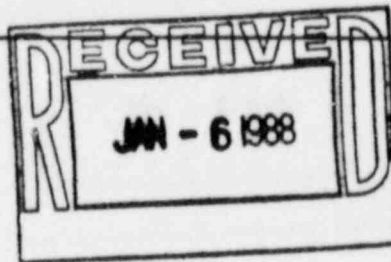
H Scott

High Mountain

Inspection Service, Inc.

Quality Inspection

January 4, 1988



Mr. Richard L. Bangart
U. S. Nuclear Regulatory Commission
811 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Dear Mr. Bangart:

RE: License 49-26808-1
Docket 30-29019

This letter is in response to the November 30, 1987 Notice of Alleged Violation and the items below correspond directly to the items in that notice.

- A. Failure to post documents pursuant to 10 CFR 19.11(a) and (b).

All High Mountain Inspection Service, Inc. employees, including non-radiography personnel, are required to read 10 CFR Parts 19, 20 and 34, the NRC Materials License, and the operating and emergency procedures. Copies of these documents are also maintained in each radiography vehicle for reference.

A notice stating that the above documents are available from C. R. Cline, Vice President, has been attached to the NRC-3 form which is posted in the office.

- B. Failure to maintain survey records of incoming packages pursuant to 10 CFR 20.401(b).

Contrary to the statements in the notice of alleged violation High Mountain Inspection Service, Inc. has never received any ~~Cs-137~~ or ~~Co-60~~ sources, but Ir-192 sources have been received. Radiation levels at the surface of the package and at 1 meter from the surface of a package are recorded on the Federal Express airbill accompanying the shipments. Representative copies of airbill were presented for examination at the October 7, 1987 enforcement conference in Denver, Colorado.

- C. Failure to maintain oral examination and on-the-job training records pursuant to 10 CFR 34.31(c).

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Radiographers and assistant radiographers have satisfactorily demonstrated to High Mountain Inspection Service, Inc. their competency to use radiography equipment in accordance with the company's operating and emergency procedures pursuant to Section 6.6d of the license application. Records of these examinations were not previously maintained, but their performance was documented on the next field inspection. Records of the initial examinations are now being maintained on the Radiography Equipment Operation Performance form. The daily site radiation survey form lists individuals acting as assistant radiographers and their working times are documented by payroll records. Admittedly this is a fragmented method of documenting on-the-job training. Periods of service as an assistant radiographer are now separately maintained in each individual personnel file.

- D. Failure to perform quarterly radiographic equipment inspections pursuant to 10 CFR 34.28(b).

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Quarterly equipment inspections were being performed and documented on the Radiography Equipment Operation Performance Sheets which contain (1) Examination of Camera; (2) Examination of Source Tube; and (3) Examination of Crank-out. A Radiography Equipment Inspection form which contains more detailed information was presented at the October 7, 1987 enforcement conference in Denver, Colorado, and it is now being used.

- E.1.a and b. Failure to perform and to maintain records of unannounced quarterly field inspections of radiographers and assistant radiographers.

Field inspections of radiography personnel were erroneously being performed and documented every six months. Documented field inspections of all radiography personnel were performed in the third and fourth quarters of 1987, and they will continue on the required quarterly interval.

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E.2 Failure to prepare hazardous material shipping papers pursuant to 10 CFR 71.5 and 49 CFR 172.202.

3 An effort was made to comply with the shipping paper requirements, albeit the specific terminology was lacking, and the information was carried on the vehicle. A form containing the required shipping paper information was presented at the October 7, 1987 enforcement conference in Denver, Colorado, and it is currently being used.

As indicated, corrective action has already been taken on each item. If additional information or clarification is required I would be pleased to respond.

Sincerely,

C. R. Cline

C. R. Cline
Vice President