



# Calumet Testing Services

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**UNITED STATES NUCLEAR REGULATORY COMMISSION  
ATTN: DOCUMENT CONTROL DESK  
WASHINGTON DC 20555-0001**

**APRIL 30, 2022**

**cc. UNITED STATES NUCLEAR REGULATORY COMMISSION  
REGIONAL ADMINISTRATOR REGION III  
2443 WARRENVILLE ROAD, SUITE 210  
LISLE, ILLINOIS 60532 – 4352**

**SUBJECT: REPLY TO A NOTICE OF VIOLATION**

Sir/Madam

I am writing this letter in response to two (2) Severity Level IV violations noted during a non-routine inspection at a temporary jobsite in South Bend, Indiana on February 10, 2022. Based on the results of that inspection it was determined that the drive cable in the control crank assembly was not in good working condition, and the crew was not properly surveying the equipment between exposures.

I have completed the following corrective steps towards completing corrective actions in this matter.

I have sat down individually with all personnel involved with the Radiography Program and presented them with the following information package which they were given a copy of to keep.

- 1) I read to them the follow-up letter sent to me by the USNRC summarizing the results of the findings and additional information/records that were required.
- 2) I read to them my bulletin dated 3/31/2022 regarding the meaning of these violations and the actual wording of the specific sections of 10 CFR 34.31(a) and 10 CFR 34.49(b). We reviewed the 3 photos taken at the jobsite of the drive cable in question. It was pointed out that conditions such as wear, rust, and permanent bends in the cable are not acceptable conditions on the drive cable. I stressed to them that a more thorough daily inspection shall be done on all equipment. Regarding the incomplete surveys being conducted between exposures, I strongly insisted that 10 CFR 34.49(b) be followed to the letter. Conduct a survey of the radiographic exposure device and guide tube after each exposure when approaching the device or guide tube to assure that the source has been returned to the shielded position.
- 3) Reviewed previous literature from NRC Newsletters and CTS Files regarding compliance and deliberately failing to comply with Federal Regulations and the CTS Radiation Program.


- 4) \* After discussing these issues, each employee was asked if they understood Paragraphs 34.31(a) and 34.49(b), they also received the CTS Bulletin and corresponding photos and literature regarding the February 10<sup>th</sup> inspection, and were asked if they understood that failure to comply with these or other USNRC rules as taught in the CTS training program are grounds for discipline or termination. A signed and dated letter of this corrective action training for each individual shall be kept on file.

Corrective steps that will be taken include:

- 1) A more aggressive approach to conducting six-month unscheduled audits of Radiographers and Radiographers Assistants. This would include watching more exposures while trying to better conceal the auditor from the crew and disconnecting the controls from the camera when feasible in order to examine the condition of the control cable.
- 2) Continue to post USNRC and CTS briefs regarding the use of improperly maintained equipment and the lack of a proper radiation survey.

I will start these corrective steps immediately.

Sincerely,

A handwritten signature in black ink, appearing to read 'John A. Korienek'.

JOHN KORIENEK  
Radiation Safety Officer  
Cal Testing Services, Inc.  
License No. 13-16347-01