PIEDMONT ENGINEERING, Inc.
Geotechnical Engineering Hydrology / Hydraulic Engineering Biotechnical Engineering Geotechnical Testing

November 23, 2004

Mr. Larry Donovan

United States Nuclear Regulatory Commission, Region IV

611 Ryan Plaza Drive, Suite 400

Arlington, TX 76011-4005

Reply to a Notice of Violation

Dear Mr. Donovan:

In response to the letter of November 2, 2004 I offer both apologies for my lack of attention concerning the violations mentioned in your letter and the following actions that were taken to rectify the oversights. Immediately following your visit I contacted Qal-Tek Associates of Idaho Falls, Idaho to perform a gauge calibration, a leak test, and an area survey. The results of all of these are enclosed. We will conduct a radiation safety program review next month since the gauge is now locked in storage for the winter and my technician has taken another job. I am now the only employee but I am now in the process of recruiting a replacement and will put both him/her and myself in training. There is training for Nuke Gauge Training and RSO training in Idaho Falls next month and I am trying to get into it. If I cannot get into this class I will find the next available class in this area.

Piedmont Engineering is a small firm that consists only of myself and one part-time employee at this time. We have consistently rarely used the gauge and it is usually in storage. Therefore, we tend to forget about it or only use it for a few days per month in the summer. Niki Griffis, who was certified to operate the gauge in June of 2000 was the only operator of the gauge in the last four years and she has now left for a new position at another firm. I am therefore the only licensed operator and will be responsible for its safety, storage, and operation. I have conducted a safety meeting with my new part-time employee to warn him of the safety requirements around the gauge, the need to lock the doors to the building (the handle and lock box are always locked), and the necessity to stay away from the gauge if it is not necessary to be near it. He has been instructed

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Belgrade, Montana 59714
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Phone (406) 388-9828
Fax (406) 388-9653

to not handle the gauge at all and to report to me if anything seems out-of-place around the gauge. I will enroll this employee in the training even if he never uses the gauge to familiarize him with the safety requirements. I will not have a radiation badge for him until he is using the gauge, if ever.

Again, I apologize for the poor record keeping and will have this situation remedied as soon as I can enroll in additional training. I have left Inter-Fluve and am now running Piedmont Engineering again on a full-time basis. We will also leak test the gauge on a six month frequency whether we are using the gauge or not. We are such a small shop that with one employee we simply talked things over concerning the nuclear gauge and unfortunately did not formalize our conversations. This will be formally documented in the future with safety meetings and a record of the meeting. I am also allocating a library area in my office for all of the documentation for the gauge. Please let me know if there is anything that needs further addressing with regard to this matter.

Sincerely,

Patrick L. Redmond

Patrick L. Redmond, President

Qal-Tek Associates
INSTRUMENTATION AND PROFESSIONAL SERVICES
3998 COMMERCE CR. IDAHO FALLS, IDAHO 83401
(208) 523-5557 FAX (208) 524-8470
www.qaltek.com

SEALED RADIOACTIVE SOURCE LEAK TEST REPORT

Company: Piedmont Enginieering
Street: 1215 Apple Way
City/St/Zip: Belgrade MT 49714
Phone: 406-388-9828 Fax: LT Frequency: 6 Months

TEST INSTRUMENT

Mfg'r:	NE Bicron	Model:	Electra	Serial #:	1298	Cal. Date:	08/26/2004
MDA:	<0.005 µCi	α efficiency:	>25%	β efficiency:	>33%	Det. Type:	ZnS (Ag)

Qal-Tek Associates certify the above instrument has been calibrated using radioactive standards traceable to NIST, or traceable to calibration facilities for other ISO members, or have been derived from acceptable values of natural/physical constraints, or have been derived by ratio tye of calibration techniques. Accuracy of the principal radiation calibration sources used is greater than or equal to the required accuracy of the equipment being calibrated. The Qal-Tek Associates calibration system conforms to ANSI N323-1997. All calibrations are performed in accordance with the Qal-Tek Associates Quality Assurance Management Program (QAMP) by QP-PRO-001, rev 3, 2001, which is available by written request.

LEAK TEST RESULTS

Mfg'r	Model #	Inst. Serial #	Isotope	Activity		net α CPM	net b/g CPM	pass/fail
CPN	MC3	9686	AM241	50 Mci		0	17	P
			Cs137	10 Mci		0	17	P

Date Sources Leak Tested: 10/26/2004

Next Leak Test Due: 04/27/2005

Qal-Tek Associates certifies that all leak test measurements are performed in accordance with NRC licensee requirements for isotopic detection limits. For this purpose the MDA is below the NRC regulatory limits of <0.005 uCi

Cody Brammer
Instrument Technition

10/26/2004
Date

Qal-Tek Associates
Gauge Calibration Report

CPN Gauge Model: MC3
Serial Number: 9686
Calibration Density Standard Count: 30446
Calibration Moisture Standard Count: 8887
Calibration Date: 10/26/2004

ValiDator Serial Number: 99101098

Print Date: 10/26/2004

Depth	ValiDator Count	ValiDator Density	A	B	C
0.0	15012	138.1	2.61685	64.85704	0.18153
1.0	29560	139.6	4.16909	91.27379	0.06698
2.0	67862	136.6	14.16785	67.21311	0.36357
4.0	67463	124.1	21.86867	48.98940	0.46947
6.0	43383	126.8	12.58607	62.00528	-0.20422
8.0	15236	152.6	16.18732	42.14418	0.06728
10.0	10815	140.3	14.70362	35.83679	0.06185
12.0	8285	127.4	9.89672	33.82018	0.04171

Moisture Parameters:

A	B
58.82486	3.26327

Qal-Tek Associates
3998 Commerce Circle
Idaho Falls, ID 83401

Piedmont Enginieering
1215 Apple Way
Belgrade, MT 49714

Contact Us at:
(208) 523-5557 - Main Office
(208) 523-5698 - Operations
(208) 523-6885 - FAX

Calibrated by Cody Brammer

Date: 10/26/2004 **Next Cal Due Date:** 10/26/2005

Calibration Traceability

Wet Densities are derived using a Troxler Moisture/Density gauge calibrated on a National Institute Of Standards and Technology (NITS) traceable set of standard blocks. The equipment used to calibrate the reference blocks were calibrated against NIST Class F (+/- 0.01% and NIST 821/25604.The entire calibration proceedure is open for review at Instro Tek Inc.(Raleigh, NC) and Qal-Tek Associates.

Qal-Tek Associates
INSTRUMENTATION AND PROFESSIONAL SERVICES
3998 COMMERCE CR. IDAHO FALLS, IDAHO 83401
(208) 523-5557 FAX (208) 524-8470
www.qaltek.com

Invoice

Date	Invoice #
11/3/2004	4226

Bill To

PIEDMONT ENGINEERING
1215 APPLE WAY
BELGRADE MT 49714

Ship To

P.O. No.	Terms	Cal. Tech	Ship Via	FOB

Item	Qty	Description	Serial#	ITS/STS#	Unit-Price	Amount
NDG Calibration	1	NDG Calibration CPN MC3	9686	X032-04	295.00	295.00
NDG Leak Test	1	NDG Leak Test CPN MC3	9686	X032-04	25.00	25.00

Make Checks Payable to QAL-TEK ASSOCIATES.

Subtotal	$320.00
Idaho Sales Tax...	$0.00
Balance Due	$320.00

Qal-Tek Associates L.L.C. as a courtesy to our customers will offer a limited 60 day warranty on all reconditioned guages and portable instruments we sell. We pride ourselves on excellence, and will work hard to correct any problem we may have been reponsible for. We are not responsible for the abuse, misuse or mishandling of any equipment not utilized according to the proper specifications and such issues will be subject to our regular services fees.

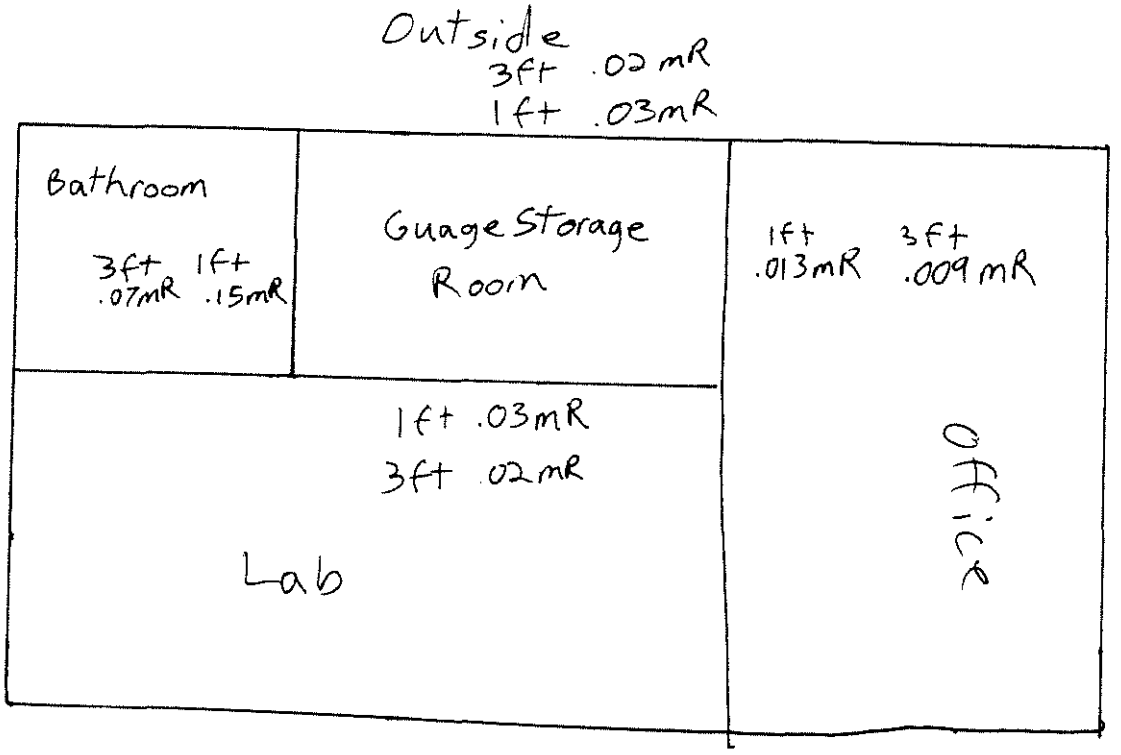
It is our customer's responsibility to contact Qal-Tek Associates L.L.C. and report any problems, prior to returning the item to us. We will determine if the repairs/recalibrations required are the responsibility of Qal-Tek Associates L.L.C., agree upon a workable service plan and establsih a service fee.

AREA RADIATION SURVEY

Survey Performed for: Piedmont Engineering

Date Performed: 10/26/04
Instrument Model: Micro Rem
Instrument S/N #: B372R
Cal. Date: 8/26/04
Cal. Due Date: 8/26/05

Unoccupied Controlled Access Area



Survey Performed By:
Qal-Tek Associates
3998 Commerce Circle
Idaho Falls, ID 83401
(208) 523-5557

Surveyor: Cody Brammer
Date: 11/10/04
Time: 7:45 am

NUKE GAUGE CERTIFICATION & RADIATION SAFETY OFFICER TRAINING

QAL-TEK ASSOCIATES WILL BE HOLDING A CLASS

IN

IDAHO FALLS, IDAHO

ON

DECEMBER 7TH 2004

PLEASE CALL (208) 523-5557 TO REGISTER

GROUP DISCOUNTS ARE AVAILABLE AND CLASSES ARE AVAILABLE ON REQUEST.