

# LOCHNER

H.W. LOCHNER, INC., 20 North Wacker Drive, Suite 1200, Chicago, Illinois 60606

Phone: (312) 372-7346  
Fax: (312) 372-8208  
www.hwlochner.com

January 12, 2005

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Dear Sir or Madam:

Subject: License No. 12-28232-01  
Docket No. 03030661

## REPLY TO NOTICE OF VIOLATION

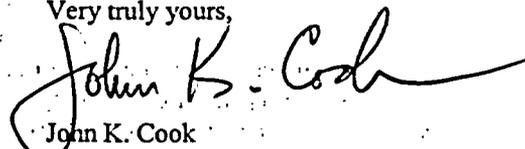
This is in reference to the letter dated January 3, 2005 which included the results of a safety inspection performed on December 1, 2004 in our Rocky Hill, CT office. A Notice of Violation was enclosed which listed one violation of NRC requirements.

In accordance with the provisions 10 CFR 2.201, we hereby are replying to this notification as follows:

- 1) Reason for Violation: Time interval between Leak Tests of 2 Nuclear Gauges exceeded 6 month limit.
- 2) Corrective Steps: Leak Tests of both gauges immediately performed.
- 3) Avoidance of Further Violations: Notifications have been placed into the Microsoft Outlook calendars of both Radiation Safety Officer and Office Manager as a reminder to perform leak tests on semi-annual basis on or about June 1 and December 1 of each year. The RSO will ensure leak tests are performed per requirements. In addition to this, at the corporate level, the Director of Human Resources will follow up with the local RSO in five month intervals to insure that Leak Tests have been scheduled and completed.
- 4) Date When Full Compliance will be achieved: December 7, 2004.

Enclosed please find copies of the most recent leak test results for the 2 nuclear gauges. Please note that previous to July 2003, leak test were regularly performed within the required 6 month interval. Along with the implementation of new procedures, we give you our company's commitment that these violations will not be repeated. We hope that the measures taken will meet with your approval. If you have any questions or require additional information, please contact Christopher Hylas at (860)-513-4003.

Very truly yours,

  
John K. Cook  
Director of Human Resources

Enclosure

cc: U.S. Nuclear Regulatory Commission  
Regional Administrator  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

IE07



**Troxler Electronic Laboratories, Inc.**

3008 Cornwallis Rd., P.O. Box 12057  
Research Triangle Park, NC 27709  
Tel: (877) 876-9537 Fax: (919) 485-2250

License: NC 032-0182-1

79081

**LEAK TEST CERTIFICATE**

**DEVICE:**

Model: 3440 Serial No: 21761

**SEALED SOURCES:**

SERIAL NO.	MEASURE DATE	NUCLIDE	ACTIVITY	
			(GBq)	(mCi)
75-3336	12/29/1992	CS-137	0.296	8
47-17062	8/6/1992	AM-241:BE	1.48	40

**LEAK TEST ANALYSIS:**

Sample collected on: 12/06/2004

Sample analyzed on: 12/07/2004 at 1:23:00 PM

Analyzed by: J.OLSEN

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.30E+01	2.09E+01
Background measurement (cpm)	0	24
Sample measurement (cpm)	0	15
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	4.4E-01	1.2E+00

This certifies that the above leak test results are:

Less than 185 Bq (0.005 uCi)  Greater than 185 Bq (0.005 uCi)

If greater than 185 Bq (0.005 uCi):

Person Notified \_\_\_\_\_ Date \_\_\_\_\_

Phone \_\_\_\_\_ and/or Fax \_\_\_\_\_



Troxler Electronic Laboratories, Inc.

3008 Cornwallis Rd., P.O. Box 12057  
Research Triangle Park, NC 27709  
Tel: (877) 876-9537 Fax: (919) 485-2250

License: NC 032-0182-1

File - General  
Troxler  
CH

LEAK TEST CERTIFICATE

DEVICE:

Model: 3440 Serial No: 16132

SEALED SOURCES:

SERIAL NO.	MEASURE DATE	NUCLIDE	ACTIVITY	
			(GBq)	(mCi)
47-11540	4/23/1988	AM-241:BE	1.48	40
50-5222	5/18/1988	CS-137	0.296	8

LEAK TEST ANALYSIS:

Sample collected on: 12/02/2004  
Sample analyzed on: 12/07/2004 at 11:58:00 AM  
Analyzed by: J.OLSEN

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.30E+01	2.09E+01
Background measurement (cpm)	0	24
Sample measurement (cpm)	1	22
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	4.4E-01	1.2E+00

This certifies that the above leak test results are:

Less than 185 Bq (0.005 uCi)       Greater than 185 Bq (0.005 uCi)

If greater than 185 Bq (0.005 uCi):

Person Notified \_\_\_\_\_ Date \_\_\_\_\_

Phone \_\_\_\_\_ and/or Fax \_\_\_\_\_

