

KEY - TECH

210 Maple Place P.O. Box 48 Keyport, NJ 07735 Phone 732-888-8308 FAX 732-888-8307

REPLY TO A NOTICE OF VIOLATION

January 20, 2006

UNITED STATES NUCLEAR REGULATORY COMMISSION
Document Control Desk
Washington, DC 20555-0001

Attn: Document Control Desk
US NRC

**Ref: US NRC, REGION 1
ON-SITE INSPECTION 03017263/2005001
KEYPORT, NEW JERSEY SITE AND NOTICE OF VIOLATION**

To Whom It May Concern:

The attached information is in response to the Notice of Violation on inspection No. 03017263/2005001 performed by your agency on Nov. 21 and 28, 2005 at our facilities located in Keyport, New Jersey.

If you have any questions, please do not hesitate to contact us.

Very truly yours,

KEY - TECH



William Boehler
General Manager

RWS/WB: js
Attachment

Email Address: KeyTech@optonline.net

IE07

NOTICE OF VIOLATION

Violation A.

The technician who conducted the leak tests did not make a leak test schedule, the tests were conducted at a random interval (7 months – 12 months). A new schedule with 6-month interval has been made for leak test, this schedule will be followed strictly from now on. According to our record, the recent leak tests were done in October 20, 2005, next scheduled test date will be April 20, 2006. Please see attached copy.

Violation B.

All our gauge users were found adequately and successfully trained by a gauge training course during the inspection except one user. He was trained about operating the gauge and radiation safety, but he was not on our trained user list due to the failure in safety exam. Because this technician already left our company last December, the new training course could not be given to him. As of today, new gauge users will not be allowed to use the gauges until they have the training course and pass the exam in the course.

Violation C.

It was a mistake, because the person who handled this safety protection was not in the office during inspection, the review records could not be found. The review of radiation safety protection content and implementation was done quarterly. Please see attached copies.

Violation D. 1.

We did not realize all hazmat employees should receive a hazmat training at least once every three years. We already bought an approved self study hazmat training CD (transportation guide for nuclear gauges) from Q/C Resource training company in January 11, 2005. As of today, all our gauge users have been trained with this CD and passed the exams in the CD.

Violation D. 2.

We did not know UN number has been changed from UN 2974 to UN 3332. The labels on two transport boxes with wrong UN number were replaced by the new labels with UN3332 during the inspection, other labels on the boxes are correct. As of today, the UN number on all shipping papers have been changed to UN3332. Please see attached copy.

Violation D. 3.

As of today, all shipping papers will be stored in a holder mounted to the inside of the door on the driver's side of the vehicle.

Violation C.

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 4640B SERIAL NUMBER 1198 SOURCE TYPE _____ ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|----------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 5-4-05 | sHop | Rm | OK | OK | OK | OK | OK |
| 8-8-05 | sHop | Rm | OK | OK | OK | OK | OK |
| 11-10-05 | sHop | Rm | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection



NOTE: NO means lost lock

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 4640B SERIAL NUMBER 2025 SOURCE TYPE _____ ACTIVITY LEVEL _____

Figure 6-2. Sample Quarterly Inventory and Safety Inspection

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 12-2-04 | S Hop | RM | OK | OK | OK | OK | OK |
| 3-6-05 | S Hop | RM | OK | OK | OK | OK | OK |
| 6-6-05 | S Hop | RM | NO | OK | OK | OK | OK |
| 9-4-05 | S Hop | RM | OK | NO | OK | OK | OK |
| 12-8-05 | S Hop | RM | OK | OK | OK | OK | OK |
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NOTE: NO MEANS LOST LOCK

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 620 SERIAL NUMBER 46413 SOURCE TYPE CS 137 ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 4-16-03 | SHOP | RM | OK | OK | OK | OK | OK |
| 7-3-03 | " | " | OK | OK | OK | OK | OK |
| 10/03 | SHOP | RM | NO | NO | OK | OK | OK |
| 1-6-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 4-10-5 | " | RM | OK | OK | OK | OK | OK |
| 7-4-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 10-1-05 | SHOP | RM | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection

A. TROXLER

Note: NO means LOST LOCK

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 3440 SERIAL NUMBER 16356 SOURCE TYPE CS137 ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 5-12-03 | SHOP | RM | OK | OK | OK | OK | OK |
| 8-16-03 | SHOP | RM | NO | NO | OK | OK | OK |
| 11-4-03 | SHOP | RM | OK | OK | OK | OK | OK |
| 2-6-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 5-10-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 8-11-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 11-4-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 2-8-05 | SHOP | RM | NO | NO | OK | OK | OK |
| 5-6-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 8-7-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 11-6-05 | SHOP | RM | OK | OK | OK | OK | OK |

Figure 6-2. Sample Quarterly Inventory and Safety Inspection

TROXLER

NOTE: NO means lost lock

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 3440 SERIAL NUMBER 17106 SOURCE TYPE _____ ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 5-8-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 8-9-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 11-6-05 | SHOP | RM | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection

A. TROXLER

NOTE: NO MEANS LOST LOCK.

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 3440 SERIAL NUMBER 17109 SOURCE TYPE _____ ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 5-8-05 | SHOP | RM | NO | OK | OK | OK | OK |
| 8-9-05 | SHOP | RM | NO | OK | OK | OK | OK |
| 11-6-05 | SHOP | RM | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection



NOTE: NO MEANS LOST LOCK

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 341B SERIAL NUMBER 13493 SOURCE TYPE CS137 ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|----------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 5-12-03 | S Hop | R M | OK | OK | OK | OK | OK |
| 8-16-03 | S Hop | R M | NO | NO | OK | OK | OK |
| 11-16-03 | S Hop | R M | OK | OK | OK | OK | OK |
| 2-14-04 | S Hop | R M | OK | OK | OK | OK | OK |
| 5-10-04 | S Hop | R M | OK | OK | OK | OK | OK |
| 8-16-05 | S Hop | R M | NO | NO | OK | OK | OK |
| 11-3-05 | S Hop | R M | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection

TROXLER

Note: NO means Lost Lock

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 3411B SERIAL NUMBER 7639 SOURCE TYPE CS137 ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 4-10-4 | SHOP | RM | NO | NO | OK | OK | OK |
| 7-6-04 | SHOP | RM | NO | NO | OK | OK | OK |
| 10-6-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 1-4-5 | SHOP | RM | OK | OK | OK | OK | OK |
| 4-6-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 7-8-05 | SHOP | RM | OK | NO | OK | OK | OK |
| 10-7-05 | SHOP | RM | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection

A. TROXLER

NOTE: NO MEANS LOST LOCK

QUARTERLY INVENTORY AND SAFETY INSPECTION

GAUGE MODEL 3411B SERIAL NUMBER 10703 SOURCE TYPE CS137 ACTIVITY LEVEL _____

| DATE | LOCATION | INITIALS | GAUGE LOCK | CASE LOCK | STORAGE LOCK | SOURCE LABELS | SLIDING BLOCK |
|---------|----------|----------|------------|-----------|--------------|---------------|---------------|
| 12-4-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 3-4-04 | SHOP | RM | OK | NO | OK | OK | OK |
| 6-6-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 9-9-04 | SHOP | RM | OK | OK | OK | OK | OK |
| 12-3-04 | SHOP | RM | NO | OK | OK | OK | OK |
| 2-6-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 6-8-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 9-3-05 | SHOP | RM | OK | OK | OK | OK | OK |
| 12-7-05 | SHOP | RM | OK | OK | OK | OK | OK |
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Figure 6-2. Sample Quarterly Inventory and Safety Inspection

A. TROXLER

NOTE: NO MEAN'S LOST LOCK



**Transportation Guide
for Nuclear Gauges**

CS-137

TYPE

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Violation D.1.

Violation D. 2.

B I L L O F L A D I N G

OWNER: Keegan Technology & Testing Assoc., Inc.
210 Maple Place
Keyport, NJ 07735

CARRIER: William Boehler
EMERGENCY RESPONSE
TELEPHONE: Day (800) 757-6755
Eve. (732) 495-2413

| No | HM | DESCRIPTION OF MATERIALS, PACKAGING AND SPECIAL MARKING |
|----|----|--|
| 1 | X | RQ: Radioactive Materials, Special Form, n.o.s., UN 3332 10 mCi Cs-137 and 40 mCi Am-241:Be Type A Package Radioactive Yellow II Label Transport Index 0.2 |

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the U. S. Department of Transportation.

Owner: Keegan Technology & Testing Assoc., Inc.

By: William Boehler
William Boehler, V.P.



TROXLER NUCLEAR GAUGE EMERGENCY RESPONSE INFORMATION
REQUIRED FOR TRANSPORTATION

(Reference: DOT P5800.5 ERG93, and 49 CFR)

Call Troxler Electronic Laboratories, Inc, at (919) 549-9539 for Emergency Assistance

1. PROPER SHIPPING NAME:

- ◆ RADIOACTIVE MATERIAL, TYPE A PACKAGE, SPECIAL FORM, 7 UN3332

POTENTIAL HAZARDS

2. HEALTH HAZARDS

- ◆ Radiation presents minimal risk to lives of persons during transportation accidents.
- ◆ Undamaged packages are safe; damaged packages or materials released from packages can cause external radiation hazards. Contamination is not suspected.
- ◆ Packages (cartons, boxes, drums, articles, etc.) identified as "Type A" by marking on packages or by shipping papers contain non-life endangering amounts. Radioactive sources may be released if packages are damaged in moderately severe accidents.
- ◆ Packages (large and small, usually metal) identified as "Type B" by marking on packages or by shipping papers contain potentially life-endangering amounts. Because of design, evaluation, and testing of packages, life-endangering releases are not expected in accidents except those of utmost severity.
- ◆ Commonly available instruments can detect most of these materials.
- ◆ Water from cargo fire control is not expected to cause pollution.

3. FIRE OR EXPLOSION

- ◆ Packagings can be consumed without content loss from sealed source capsule.
- ◆ Radioactive source capsules and Type B packages are designed to withstand temperatures of 1475 °F (800 °C).

EMERGENCY ACTION

4. IMMEDIATE PRECAUTIONS

- ◆ Priority response actions may be performed before taking radiation measurements.
- ◆ Priorities are life saving, control of fire and other hazards, and first aid.
- ◆ Isolate hazard area and deny entry. Notify Radiation Authority of accident conditions.
- ◆ Delay final cleanup until instruction or advice of Radiation Authority.
- ◆ Positive pressure self-contained breathing apparatus (SCBA) and structural firefighter's protective clothing will provide adequate protection against internal radiation exposure, but not external radiation exposure.

5. FIRE

- ◆ Do not move damaged packages; move undamaged packages out of fire zone.
- ◆ Small Fires: Dry chemical, CO₂ water spray or regular foam.
- ◆ Large Fires: Water spray, fog (flooding amounts)

6. SPILL OR LEAK

- ◆ Do not touch damaged packages or spilled material.
- ◆ Slightly damaged or damp outer surfaces seldom indicate failure of inner container.
- ◆ If source is identified as being out of package, stay away and await advice from Radiation Authority.

7. FIRST AID

- ◆ Use first aid treatment according to the nature of the injury.
- ◆ Persons exposed to special form sources are not likely to be contaminated with radioactive material.