

**KNIGHT CONSULTING ENGINEERS, INC.**

P.O. BOX 29

WILLISTON, VERMONT 05495

Tel: 802-879-6343

Fax: 802-879-6376

STEPHEN C. KNIGHT, JR., P.E.  
MARTIN W. HAIN, P.E.  
ERIC H. GODDARD, P.E.  
ROBERT A. LOVGREN, P.E.  
BARBARA J. EVANS, P.E.

CIVIL ENGINEERING  
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CONSTRUCTION INSPECTION  
CONSTRUCTION TESTING  
SURVEYING

May 29, 2006

United States Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Re: NRC License No. 44-19115-02, Docket No. 030-22089

Subject: Reply to a Notice of Violation

To Whom It May Concern:

This letter is in response to a Notice of Violation received subsequent to a safety inspection conducted by Mr. David J. Collins at our office in Williston, Vermont on March 30, 2006. Mr. Collins identified two level IV violations as documented in a letter received from Mr. John D. Kinneman, Chief, Security and Industrial Branch, Division of Nuclear Material Safety and dated May 3, 2006.

Our responses to these violations follows:

Violation A: (10 CFR 20.1101(c), Radiation Protection Program) This violation occurred basically due to lack of record keeping on my part. I have been reviewing safety issues on an on-going basis with gauge operators rather than at a set interval (annually) as required and no documentation has been maintained. This situation will be corrected by conducting coordinated reviews with all operators at specific time interval and maintaining records on file in our office with the date of the review and a list of attendees attached. The latest review has been conducted prior to this letter being sent.

Violation B: (10 CFR 71.5(2), Refresher Hazmat Employee Training) This violation occurred for similar reasons as noted above (on an informal basis and no records were kept). Subsequent to our 2002 inspection I attempted to schedule our gauge operators into an appropriate refresher course, without success. Since our recent inspection, I have ordered a self-training CD-Rom entitled "Transportation Guide for Nuclear Gauges" Published by Atechcenter, Inc., which satisfies the requirements of 49 CFR for employees transporting nuclear moisture-density gauges. As soon as this material is received. Each gauge operator will review the program and records will be kept on file in our office with the employees name and date of review attached. I anticipate receiving this material shortly and beginning the reviews immediately thereafter.

JEO7

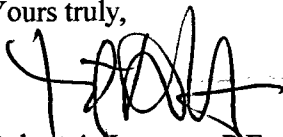
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Finally, since our recent inspection by Mr. Collins I have delegated some of my Non-RSO activities to other personnel to allow myself additional time to focus on Radiation Safety issues and the associated documentation and record keeping.

Please contact the undersigned if you have any questions regarding this letter.

Yours truly,



Robert A. Lovgren, P.E., Radiation Safety Officer  
KNIGHT CONSULTING ENGINEERS, INC.

RAL/nmv

cc: United States Nuclear Regulatory Commission  
Region I  
Attn: Mr. John D. Kinneman  
475 Allendale Road  
King of Prussia, PA 19406-1415

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