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Date: 11/09/2007 2:51:37 PM
Subject: Corrective Action for NRC Field Audit

Mr. Gordon

Attached is our corrective action for NRC field audit.

Corrective Action for NRC Field Audit

We had informed our field inspectors via a second memorandum on May 30th, 2007 of the NRC requirement that portable nuclear density gauges are "required to use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal whenever the gauges are not under the control and constant surveillance of the licensee".

During a recent NRC field audit, one of our operators was observed to have a locked gauge in a locked case chained and locked to the bed of his truck, at one of our temporary job sites. While he believed this satisfied the NRC requirement of two (2) independent systems to secure the gauge, we were informed that this did not technically satisfy the requirement since the chain was not completely wrapped around the case.

We believe that this was a misinterpretation of the stated requirement and not an overt disregard for the NRC requirement. Our corrective action taken subsequent to the NRC inspection included meeting with all of our trained operators and describing the proper method gauge security in the open bed of a pickup truck. Additionally, periodical field inspection will be performed to ensure the two independent physical controls are maintained at all temporary job sites and another follow up memorandum on the security of portable gauges.

Thank you,
David R. Mitrik
Radiation Safety Officer