



GeoConcepts Engineering, Inc.

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March 16, 2007

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Document Control Desk

Subject: Reply to a Notice of Violation EA-06-321

Dear Sir/Madame:

GeoConcepts Engineering, Inc. received the above referenced Notice of Violation on February 15, 2007. The Notice of Violation resulted from a site inspection conducted by Mr. Dick Ladun of the U.S. Nuclear Regulatory Commission. The following are our responses to the four (4) violations noted.

- A. During the inspection, it was noted that two independent physical controls were not being used to secure gauges during transport. This violation occurred because of a misinterpretation of the regulations on my part. Upon Mr. Ladun's notification of the violation during the inspection, I dispatched a company representative to a hardware store to purchase additional chain for our field staff to use to secure gauges properly. In addition, the correct interpretation of this requirement was verbalized to all users of nuclear density gauges. Subsequently, all users received training in accordance with 49 CFR 172, subpart H.
- B. During the inspection, it was noted that an annual audit of our license was not performed. Annual audits were an oversight on my part. We have since scheduled annual audits to be performed between the Christmas Holiday and the New Year.
- C. During the inspection, it was noted that gauges were being stored at a temporary job site and being dispatched to other project sites (specifically our Martinsburg Station site). Upon being notified of this violation, arrangements were made to properly store a gauge at our Martinsburg Station project. This occurred within 30 days of the inspection by Mr. Ladun.
- D. During a site visit by Mr. Ladun to observe one of our field technicians utilizing a nuclear density gauge, it was noted that the user failed to lock the gauge or its container when the gauge was in storage inside his/her vehicle and not under direct surveillance. During the monthly technician meeting held immediately after the visit by Mr. Ladun, proper use, security, and storage of gauges was discussed with all technicians. Annual training

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on nuclear security issues has been scheduled and violation notices published and disseminated by the U.S. Nuclear Regulatory Commission have been circulated to all gauge users as a reminder of the importance of nuclear gauge security.

GeoConcepts regrets that these violations have occurred and have taken the necessary steps to ensure that they do not happen again. GeoConcepts takes nuclear gauge security very seriously and will not tolerate lapses in our security program. Field technicians are visited periodically as part of our normal quality assurance program and their use, storage, and overall handling of nuclear density gauges is something observed.

We appreciate the opportunity to respond to these violations.

Sincerely,

A handwritten signature in black ink that reads "R. Drew Thomas". The signature is written in a cursive style with a large, prominent "R" and "T".

R. Drew Thomas, C.P.G.
Radiation Safety Officer.