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ENGINEERING ASSOCIATES, P.C.
CONSULTING ENGINEERS

December 6, 2007

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

Re: Reply to a Notice of Violation
Docket No. 030-32691, Lic. # 29-28739-01
Dated: November 28, 2007

Gentlemen/Madam:

We are responding to the Notice of Violation (total 5 violations) received from your Region 1 office.

Please note:

A. The gauges are chain locked in the locked storage room. This will act as an additional barrier. Full compliance was achieved the same day of September 26, 2007 inspection. I was under the impression that the building alarm would be a barrier serving between than a lock (only our authorized personnel and owner of the building have access to the main office area otherwise the alarm will sound and the alarm company notifies the owners and police). In any case we have the two barriers and alarmed office and they will be maintained and checked.
B. All our inspectors carry transportation papers. The previous papers (inspected on September 26, 2007) did not have the detailed language as specified in App. H of NUREG-1556. The inspector however had answered Ms. Joustra's questions regarding emergency procedures. We updated the papers as requested for all gauges. We will periodically check to make sure papers are updated.
C. (1) & (2): The correct UN# and letters "RQ" are included on the papers and package (gauge boxes). It may have been overlooked since we took possession of the additional two gauges. All gauges have been checked and are in compliance. They will be periodically checked.

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(3) Two of the inspectors (not all) did not have the refresher DOT course. One inspector had left the company and recently came back and the other was an oversight. They immediately completed the refresher course and are in compliance. The records will be checked every quarter. Only inspectors fully certified will transport and use the gages.

A copy of our October 3, 2007 correspondence is also attached.

Thank you.

Very truly yours,
Gentech Engineering Associates, P.C.

Tariq Bashir, P.E.
President/R.S.O

cc: Brian Holian, Director (via Certified Mail)
Division of Nuclear Materials Safety
Region 1 – 475 Allendale Road
King of Prussia, PA 19406-1415

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ENGINEERING ASSOCIATES, P.C.
CONSULTING ENGINEERS

October 3, 2007

United States Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Attn: Ms. Judith A. Joustra
Senior Health Physicist

Re: Lic. # 29-28739-01
Docket # 030-32691

Dear Ms. Joustra:

Please note the following:

-We have the new DOT UN Sticker on the gage stored in our office. The other three gages have them also. Transportation Index (0·6) is included with UN 3332 RQ (see copy of sticker & invoice).

-Sign in/out sheet has been updated to include Project Name where gage is being taken for compaction (copy of revised sheet attached).

-DOT Refresher course for two of our employees has been scheduled for next week. In the interim they are not transporting the gage.

-The chain/lock in our storage room will act as another barrier in addition to the two barriers we had from before. Only authorized personnel have access to the building alarm.

-Certificate of Approval (updated form) and more detailed emergency procedures in case of field accident have been included with the gage transportation papers (copy attached).

-Check list/audit list will be more detailed. Note: until about 2 months ago we only had 2 troxler gages (total inventory) and these were periodically noted in our six-month meetings.

Thank you for the amended license, which includes Troxler Gage 3411.

Very truly yours,
Gentech Engineering Associates, P.C.

Tariq Bashir
President/R.S.O.

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