

U.S Nuclear Regulatory Commission
ATTN: Regional Administrator, Region IV
612 East Lamar Blvd
Arlington, TX 76011-4125

Re: Reply to the Notice of Violation; IA-08-007

(1) In response to the Notice of Violation IA-08-007 the reason for violation of 10 CFR 34.41 (a) was noted in the violation notice. The complacency of working at ASRC without incidence for numerous years combined with the pressure to perform high quality work night after night with little oversight led to the violation of the "two man rule" at the ASRC Facility.


(2) The corrective steps that have been taken have come from both the NRC and from within the company. Taking on the role of the Radiation Safety Officer has been one of the larger corrective steps that has happened. I now have to take on the responsibility for training, maintaining, organizing and supervising every aspect of the business of radiography. The management or lack there of, has put Alaska Industrial X-ray in a position of complete compliance, or possible loss of license that would have a huge impact to a company that has provided industrial services for 35 years.

(3) I have personally locked the trailers at ASRC, monitored radiation levels to ensure that they comply with the radiation boundaries established. I have brought in truck loads of dirt that have been piled to the tops of the trailers to bring down radiation levels even further. I am working with each crew on various work assignments and know first hand that compliance is mandatory. Monthly safety meetings have been established. Pete Millar has had to work every job site since the termination of Pat Kelly and Ken Vandiver which has had an impact as far as having first hand knowledge of what is going on and who is performing the work. I also hope to attend a RSO training program in November in order to increase my understanding of the many regulations and rules.

(4) The date of full compliance should be by the end of October when the NRC has reached a decision in regards to an audit by an outside agency. We have been complying with the regulations since the initial enforcement action on October of 2007.

Sincerely,

Donald Millar


Radiation Safety Officer
Alaska Industrial X-ray