



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4005

May 14, 2008

Mr. Keenan Remele, Radiation Safety Officer
Kakivik Asset Management
111 West 16th Avenue
Anchorage, Alaska 99501

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-35371/07-002 AND NOTICE OF VIOLATION

Dear Mr. Remele:

Thank you for your letter dated May 8, 2008, and facsimile from Chemtrec confirming your registration, in response to our letter and Notice of Violation dated April 30, 2008. We have reviewed your reply and find it responsive to our concerns.

We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

A handwritten signature in cursive script that reads "Anthony A. Davis for".

Vivian Campbell, Chief
Nuclear Materials Safety Branch A

Docket No.: 030-35371
License No. 50-27667-01

cc w/copy of licensee's letter dated 5/8/2008 and Chemtrec facsimile dated May 9, 2008:
Anchorage Radiation Control Program Director



Inspection • Engineering • Program Management

Docket No. 030-35371
License No. 50-27667-01

May 8, 2008

Via Certified Mail: 7007 1490 0003 6013 2388U.S.N.R.C.
Washington, DC**RECEIVED**

MAY 8 - 2008

Attention: Document Control Desk

Subject: Reply to a Notice of Violation

DNMS

This reply to a Notice of Violation is based on a NRC inspection at a temporary job site in Anchorage, Alaska of Kakivik Asset Management (Kakivik) personnel. Specifically on December 3, 2007, the licensee transported a 79 curie Ir¹⁹² source in a radiography exposure device on public highways and the shipping papers did not contain an emergency response telephone number.

Reason for the Violation

Kakivik's Materials License was originally granted to perform radiography on a client owned lease on the North Slope of Alaska. The Exclusive Use document was a "cut and paste" document that was created in the 1990's and never had an emergency number posted on it. This document has been audited by the NRC for many years and the lack of an emergency number was never questioned.

When Kakivik opened other offices and began transportation of exposure devices on public highways no thought was given to the need of an emergency number being required on this document.

The Kakivik personnel performing the radiography in Anchorage on December 3rd were permanently assigned to the North Slope and they prepared their paper work based on their North Slope experience.

Corrective Actions

Based on discussions with the Radiographic Safety Supervisors (RSS), the corrective action on the part of the previous RSO was to insert an emergency contact number on the Exclusive Use document.

After discussion with the NRC on April 2nd a memo was sent to all offices by the present RSO that required additional emergency contact numbers pertinent to the shipping office is posted on HazMat paper work.

The auditors cautioned that the emergency numbers must be monitored 24/7 during transportation. The RSO emergency contact number is a cell phone. Due to the inability of the RSO to remain in cell phone repeater range, Kakivik is entering into a registry agreement with Chemtrec. This nationally recognized emergency

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Communication Center will insure that there is 24/7 monitoring and availability of emergency response per 49 CFR 172.604. **DNMS**

All shipping and transportation paper work will have this emergency number placed on the document.

Further Corrective Actions

There will be a memo issued detailing the events of the violation and it's corrective actions. This memo will be discussed with all personnel in the Radiation Safety program, either by the RSO or the Site RSS, and tracked with rosters.

The upcoming DOT/IATA refresher training will include specific references to contact numbers and the responsibilities of monitoring these numbers.

Compliance Dates

Registration with Chemtrec will be initiated and faxed the date of this letter. All offices will be immediately issued the registration number and contact number when it is received.

All Kakivik forms requiring a HazMat emergency response number will be updated and issued within five business days, when the registration is finalized.

Refresher training for DOT/IATA requirements will be completed by the end of 2008 as part of Kakivik's Annual Refresher training requirements. This training is monitored by rosters to insure compliance.

Should there be additional information required or there are questions, please feel free to contact this office.

Sincerely,

A handwritten signature in black ink that reads "Keenan E. Remele".

Keenan E. Remele
Radiation Safety Officer

Direct: 907.770.9421
Cell: [REDACTED]
Office: 907.770.9400
Fax: 907.770.9405
Email: kremele@kakivik.com

CC: Regional Administrator, Region IV, Arlington, Texas
via Certified mail 7007 1490 0003 6013 2357

Keenan Remele

From: Smith, Renita [rsmith@chemtrec.com]
Sent: Friday, May 09, 2008 6:44 AM
To: Keenan Remele
Subject: CHEMTREC Registration Confirmation CRM:00443612

COMPANY: KAKIVIK ASSET MANAGEMENT
CUSTOMER NUMBER: [REDACTED]
ADMINISTRATIVE CONTACT: REMELE, KEENAN

This is to confirm your registration with CHEMTREC as your 24-hour hazardous materials emergency communications service. As part of confirmation of your registration, we are providing you with the CHEMTREC emergency phone numbers for use on your shipping papers. As long as your registration remains active and in good standing, you are permitted to use these numbers for your emergency communications service for shipments originating and/or terminating in the USA. Recommended text follows:

**For Chemical Emergency
Spill Leak Fire Exposure or Accident
Call CHEMTREC Day or Night**

**DOMESTIC NORTH AMERICA 800-424-9300
INTERNATIONAL, CALL 703-527-3887 (collect calls accepted)**

You are obligated to provide CHEMTREC with (or access to) all MSDSs related to your hazardous materials shipments and to keep this information current. Please follow these guidelines regarding MSDS submittal:

- Please reference your customer number and company name on every submission.
- Send clear instructions regarding whether or not the new submission replaces all prior documents or is an update/addition to current documents on file.
- We are able to accept PDF, Word, Word Perfect, Excel, Text, TIF and HTML documents.
- If your submission is in excess of 500 MSDS, an index must be included to speed entry of the documents into our system.
- For indexing information, call 800-262-8200 and select the option for MSDS to speak with a representative regarding file formats and creation.
- **Your Company Website:** If your MSDS are available on a company website, you can provide CHEMTREC with an id/password to access the information directly from your website. Contact the MSDS Dept at 800-262-8200 to see if this is an option for you.

MSDSs can be submitted to CHEMTREC in two ways:

- **Email:** send documents to msds@chemtrec.com
 - Include your company code in the subject line of the email
- **Mail:** CDs or DVDs to

MSDS Dept.
CHEMTREC/ACC
1300 Wilson Blvd.
Arlington, VA 22209

Kakivik

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cc w/o copy of licensee's ltr dtd 5/8/2008 and facsimile dtd May 9, 2008

CCain

VCampbell

JWhitten

LDonovan

RITS Coordinator

NMSB-A

RIV Materials Docket File (5th Floor)

SUNSI Review Complete: LD ADAMS: X Yes No Initials: LD
X Publicly Available Non-Publicly Available Sensitive X Non-Sensitive

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RIV:DNMS:NMSB-A	C:NMSB-A
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05/14/08	05/14/08

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E=E-mail

F=Fax