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MAR 27 2009

DNMS

March 24, 2009

Mr. G. Michael Vasquez
Acting Chief
Nuclear Materials Safety Branch A
Nuclear Regulatory Commission, Region IV
612 East Lamar Blvd., Suite 400
Arlington, Texas 76011-4005

SUBJECT: Notice of Violations Response – Management Oversight

Dear Mr. G. Michael Vasquez,

I apologize for neglecting to address your concern regarding “weaknesses in management oversight of our radiation safety program”.

At the time of the initial inspection, March 25-26, 2008, we did not have a “Manager” in place for this department, but successfully transferred a project field manager with HMA/Paving experience into this position on November 1, 2008. Prior to that move, our QC Supervisor, who is also our designated RSO, managed the department reporting directly to the corporate President/CEO.

In June 2008, the incumbent President/CEO retired and the newly appointed President/CEO recognized the deficiencies/inefficiencies of the department and pushed to rectify the situation. The current Manager reports directly to the President/CEO with active support from a Quality Control consultant. In addition, management support is being provided by our Senior Director - Asphalt Terminal and Vice President - Human Resources/Safety. Prior responsibilities included management oversight of the QC department and RSO duties, respectively.

The QC Manager has developed an action plan to ensure a proficiently managed QC department and Radiation Safety Program. The plan has been initiated since mid-November 2008 with the QC staff members. The QC Manager also has weekly status meetings with the President/CEO, weekly contact with the QC consultant, and weekly staff meetings to ensure compliance issues are being addressed as well as servicing internal/external customers.

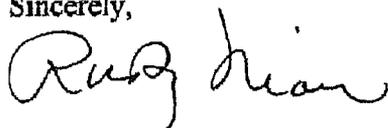
The focus is also on how valuable training is crucial in developing and encouraging a safety culture. The safety culture established will be through effective training and senior managements’ commitment to maintain and continuously improve worker proficiency.

The radiation safety training program will include periodic reviews to ensure that staff member knowledge and skills are appropriate and up to date. Refresher training will also be provided to maintain skill level(s).

Training of staff members is demonstrated by recent trips to NCAT, Asphalt Institute, as well as the QC Labs of All American Paving, Vulcan Materials, and Reliable Contracting. (QC Action Plan attached)

I believe we are on the right track to improve management oversight; however if you have any further concerns and/or questions regarding our current plan(s), please feel free to contact the undersigned at (808) 674-8383.

Sincerely,



Ms. Rusty Niau
Vice President, Human Resources/Safety
Grace Pacific Corporation

QUALITY CONTROL – ACTION PLAN:**❖ GPS FOR COMPANY VEHICLES**

- TRACK TIMES AND ROUTE OF QC TECH'S FROM THE OFFICE TO THE JOBSITES
- TIME SPENT AT EACH JOBSITE

❖ LARGE PEN BOARD

- MONTHLY SCHEDULE
 - SHOWING UP COMING PROJECTS
 - SHOWING REQUIRED CERTIFIED TESTS NEEDED
 - SHOWING WHEN SUBMITTALS ARE NEEDED
- DAILY SCHEDULE
 - SHOWING WHO'S GOING TO WHICH PROJECTS
 - SHOWING WHO'S PERFORMING TESTS IN THE LAB
 - SHOWING CERTIFIED TESTS THAT NEED TO BE COMPLETED AND BY WHOM
 - SHOWING SUBMITTAL THAT NEED TO BE COMPLETED AND BY WHOM

❖ JOB FOLDER FOR EACH PROJECT (FILE CABINET NEEDED TO STORE FILES) CONTAINING AT LEAST THE FOLLOWING:

- PROJECT SPECIFICATIONS
- MIX DESIGN
- APPROVED MIX DESIGN
- TEST REPORTS

❖ NEED TO CREATE A SUBMITTAL LOG (SPREADSHEET ON SERVER) TRACKING THE FOLLOWING ITEMS (See Attachment #1)

- DATE SUBMITTAL REQUESTED
- WHO REQUESTED SUBMITTAL
- WHEN SUBMITTAL IS NEEDED BY
- WHEN SUBMITTAL WAS SUBMITTED FOR APPROVAL
- WHEN SUBMITTAL WAS APPROVED
- AGENCY FOR THE PROJECT

❖ CREATE A MIX DESIGN REQUEST FORM FOR PAVING AND OUTSIDE VENDORS. (See Attachment #2)**❖ DAILY JOB PLAN FOR FIELD TECH'S (FOR EACH PROJECT) SHOWING AT LEAST THE FOLLOWING INFORMATION (See Attachment #3)**

- JOB LOCATION
- JOB# / FOREMAN
- TIME NEEDED AT THE JOBSITE

- LOCATION OF TEST SHOTS / RESULTS (DRAWING / SKETCH OF JOBSITE)
 - TIME ARRIVED AT JOBSITE
 - TIME LEFT JOBSITE
 - PULL SAMPLE
 - TIME / LOAD #
 - TEMP. OF MIX
 - SAMPLE
 - IN TRUCK
 - BEHIND THE SPREADER
 - AFTER FINISH ROLLER
- ❖ **HAVE BOTH A PHYSICAL JOB FOLDER AND A PAPERLESS FOLDER (PDF ON THE SERVER) FOR EACH PROJECT.**
- ❖ **NEED A GOOD HIGH SPEED SCANNER / COPIER. KONICA OR EQUIVALENT.**
- ❖ **EACH QC TECH MUST KEEP A DAILY JOURNAL (COMPOSITION BOOK) WITH DAILY ENTRIES FOR DOCUMENTATION PURPOSES.**
- PROVIDE A DIGITAL CAMERA FOR EACH TECH FOR JOB USE.
 - MUST TAKE PHOTOS OF MIX AT SITE.
 - LANDMARKS OF WHERE THE SAMPLE WAS TAKEN (STATIONS / CROSS STREETS)
 - TAKE JOBSITE PHOTOS DAILY OF ENTIRE JOBSITE. WORK PERFORMED, WORK IN PROGRESS, AND FUTURE WORK.
 - STORE PHOTOS IN PROJECT FILE ON THE SERVER.
- ❖ **DEVELOP A JOB TRACKING NUMBER (IF NONE EXISTS)**
- **EXAMPLE: Job# QO08001 (Paving Project)**
 - Q – Quality Control
 - O – Oahu
 - 08 – Year
 - 001 – Job Number
 - **EXAMPLE: Job# RM080926 (Quarry Samples)**
 - R – Rock
 - M – Makakilo Quarry
 - 08 – Year
 - 09 – Month
 - 26 – Date

- ❖ **NEED TO GET "ADVANCED NOTICE" FROM PAVING ON SPECIAL PROJECTS (HIA, FEDERAL, SPEICAL MIX)**
 - TENTATIVE MONTHLY SCHEDULE ON FUTURE QC NEEDS
 - TWO-WEEK SCHEDULE
 - DAILY JOB PLANS SHOWING THE FOLLOWING:
 - JOB NUMBER
 - JOB NAME
 - LOCATION OF WORK (STATIONS OR CROSS STREETS)
 - HAUL ROUTE OR ROUTE TO SITE
 - TYPE OF MIX
 - TONNAGE
 - START AND FINISH TIME
 - TYPE OF QC NEEDED
 - QC NEEDED ALL DAY OR JUST FOR RANDOM SHOTS
- ❖ **PROJECT DOCUEMENTATION FOR QC TECHS:**
 - A MARKED UP PROJECT PLAN (11 X 17) SHOWING THE APPROXIMATE LOCATIONS WHERE A SAMPLE WAS TAKEN
 - WALK PROJECT SITE DAILY. TAKE PICTURES TO HELP DOCUMENTS THE SITE. PHOTOS NEED TO BE DATED. TAKE UP STATION LEFT, AND DOWN STATION RIGHT.
 - FOR AIRFIELD WORK (See Attachments A.1 to A.5)
 - DEVELOP A SPREADSHEET SHOWING THE DIFFERENT PAVING LANES
 - HIGHLIGHT (BY HATCHING) HOW FAR EACH TRUCK LOAD WENT
 - DOCUMENTS WHICH TRUCK LOAD WAS SAMPLED (LANE# AND LOAD#)
 - DOCUMENTS WHERE EACH COMPACTION TEST WAS TAKEN
- ❖ **NUCLEAR GAUGES (NEED INFO. ON)**
 - NEED TO FIND OUT ABOUT CERTIFICATIONS
 - WHO AND HOW TO GET CERTIFIED
 - DOCUEMENTATION THAT IS NEEDED
 - CALIBRATION
 - FREQUENCY AND BY WHOM
 - REQUIREMENTS TO BRING ONTO FEDERAL PROJECTS

- SAFETY
 - USE
 - TRANSPORTATION
 - STORAGE
- ❖ **HAND HELD THERMO-SCANS AND THERMOMETERS**
- ❖ **LOGGING AND DOCUMENTING PROCEDURES**
 - WATCH AND LEARN FROM CEL
 - WHAT IS NEEDED / REQUIRED
 - HOW LONG MUST THE FILES BE HELD
- ❖ **PERSONNEL / HOUSEKEEPING**
 - TREAT OTHERS WITH RESPECT
 - TREAT OTHERS THE WAY YOU WANT TO BE TREATED
 - BE ACCOUNTABLE FOR YOUR ACTIONS
 - DRESS CODE (NEED TO CHECK ON)
 - COLLAR SHIRTS (NO TEE-SHIRT)
 - NEED TO LOOK PROFESSIONAL
 - HOUSEKEEPING
 - KEEP AREA CLEAN
 - 3R'S (REUSE, REDUCE, & RECYCLE)
 - EVERYTHING HAS ITS PLACE
 - FILES
 - EQUIPMENT / TOOLS
 - PERSONAL ITEMS
 - NO SMOKING IN THE OFFICE / LAB AREA
 - DESIGNATE EATING AREA (IF POSSIBLE)
- ❖ **MUST HAVE WEEKLY MEETING WITH AGENDA**
 - EARLY IN THE MORNING (5:30 AM OR 6:00 AM)
 - DISCUSS AND GO OVER DAILY AND WEEKLY SCHEDULE
 - GO OVER CURRENT, PAST, AND FUTURE
 - ASK EVERYONE FOR COMMENTS BEFORE CLOSING
- ❖ **"TURNOVER" MEETING WITH PAVING FOR LARGE / SPECIAL PROJECTS**
 - DISCUSS SPECIFICATIONS
 - WORKING HOURS
 - PROJECT LAYOUT
 - PROJECT PHASES / WORKING DAYS
 - SEQUENCE OF WORK
- ❖ **HAVE A QUARTERLY MEETING FOR TEAM BUILDING**
 - PROCESS IMPROVEMENT
 - FIELD TESTING

- LAB TESTS
- AGGREGATE / ASPHALT SAMPLING
- IN-SERVICE BY SR. STAFF
 - TESTING / SAMPLING PROCEDURES (DEMONSTRATION)
 - REPORT / PRESENTATION ON SEMINARS ATTENDED
- ❖ **DAILY "TO DO LIST" IN DOCUMENTATION BOOK**
 - FOR EACH WORKER
 - DONE FIRST THING IN THE MORNING AT WORK
 - TAKE 5 – 10 MINUTES TO LIST ITEMS YOU WANT TO ACCOMPLISH TODAY
 - CHECK OFF AS COMPLETED
 - WILL HELP TO ORGANIZED YOUR DAY
- ❖ **ROLE OF AN OFFICE CLERK / JR. QC TECH**
 - MAINTAIN FILES (PHYSICAL & SERVER)
 - GENERATE AND MAINTAIN SCHEDULES (DAILY / WEEKLY)
 - TRACK SUBMITTALS (MAINTAINS SUBMITTAL LOG)
 - MAINTAIN OFFICE
 - INVENTORY OF EQUIPMENT AND OFFICE SUPPLIES
 - PURCHASING
 - DISTRIBUTION / SUBMITTAL OF TEST REPORTS
 - TAKE PHONE CALLS (ELIMINATE DISRUPTION TO QC TECHS IN THE LAB)
 - AOA BADGES, MILITARY PASSES
 - KEEP TRACK OF PASSES, WHEN TO RENEW.
 - KEEP TRACK OF VEHICLE PASSES.