



Ammunition Systems Group
Lake City Ammunition Division
Lake City Army Ammunition Plant
P.O. Box 1000
Independence, MO 64051-1000

www.atk.com

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Return Receipt Requested

Alliant Techsystems Inc. (ATK), Lake City Small Caliber Systems
P.O. Box 1000
Independence, MO 64051-1000
June 3, 2009

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Reply to a Notice of Violation – Docket No. 030-28929

Document Control Desk Representative,

Lake City Army Ammunition Plant in Independence, Missouri received a notice of violation on June 1, 2009. This was a result of an audit performed by NRC on March 31, 2009. This Notice of Violation from NRC was posted in the workers area on June 1, 2009 and will remain posted for 5 days in accordance with 10 CFR 19.11. Below is a summary of events that led to the Notice of Violation.

The notice of violation was in reference to the unauthorized removal from service of three cesium-137 gauges. In this instance an employee listed on the license to perform routine servicing and maintenance went beyond the limitations of the license, as specified in sections 15 & 16 of the license, and removed the three isotopic gages from the production line. Once the employee removed the devices they were placed in a limited access area to secure them and a radiation warning sign was installed in order to make others aware of what was stored in the secured room. The employee performed the above tasks so that the production line could be modernized electronically and mechanically. The employee did follow the standard operating procedure and wore a TLD ring and badge, which both came back with little to no exposure.

Upon investigation of this notice of violation the following corrective actions have been established.

1. As stated in the amendment letter response dated May 26, 2009: ATK will only perform work as specified in sections 15 and 16 of License number 24-24576-01. Furthermore, the installation and removal of new (Custom) or existing devices will only be performed by companies licensed by the NRC to perform such work.
 - a. This recommendation has been implemented and a licensed company installed the devices which were removed. All further actions of this nature will be treated in this same manner.

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RFN III



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2. Documents referenced in License number 24-24576-01, which specifies the type of work the NRC has approved to be done by those listed in the license, have been obtained and filed in such a manner so that they can be easily obtained and reviewed.
3. The Standing Operating Procedure (SOP) for servicing and maintaining of isotopic gages will be revised to include specific tasks which can and cannot be completed by personal listed in License number 24-24576-01.
 - a. This item is to be completed no later than June 30, 2009.
4. This notice of violation response letter will be posted in accordance with 10 CFR 19.11 on the date it is mailed to the NRC.

We feel that with the above mitigations this will prevent any further problems. If you have any question, please contact the below.

Sincerely,

A handwritten signature in black ink, appearing to read "TJ Herman", is positioned above the typed name.

Thomas J. Herman
Senior Manager Environmental Engineering, Safety & Industrial Hygiene
(816) 796-7206

CC: Mr. Mark Satorius Region III Administrator
Radiation File