



CABRERA SERVICES
RADIOLOGICAL • ENGINEERING • REMEDIATION

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Ms. Kathy Modes
Senior Health Physicist
Decommissioning Branch, Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

November 16, 2010

License # 06-30556-01

Re: Corrective Actions

03035316

Dear Ms. Modes,

This is to inform you of corrective actions Cabrera Services, Inc. is taking in response to our recognition of a potential missed notification to utilize License #06-30556-01, condition 18A, at Schofield Barracks, Oahu, Hawaii during 2008 project activities. It involved use of a multinuclide source at an on-site gamma spec laboratory. Cabrera has invoked this license numerous times in the past for similar activities as this omission was inadvertent and certainly not willful.

Once Cabrera became aware of this, immediate corrective actions were taken that included:

- The source in question was returned to safe keeping at our standard storage location,
- Cabrera's Radiation Safety Committee was convened to review factors that could have contributed to this omission,
- All projects for which notifications were made were reviewed to ensure all conditions of our license have been met; and,
- Moving forward, Cabrera's Corporate Radiation Safety Officer (RSO) will set up a tracking matrix ensuring timely notification under conditions 18A and 18B of the license.

After reviewing all licensable activity over the past 8 years, we believe sending the source to Schofield Barracks directly from the factory indirectly bypassed Cabrera's notification process and, at least in part, caused the omission. As a result, Cabrera is creating an internal Center of Excellence consisting of its senior Health Physics professionals to provide oversight of proposals and projects to determine the likelihood of licensable activity. Their findings will be communicated to Project Managers. Project Managers will be responsible for notifying the RSO with a detailed description of those potential licensable activities well in advance of planned work to ensure timely and accurate notification.

Additionally, we determined that there were a number of more recent closure notification omissions that we are presently addressing. Those notifications will be submitted to your office in the very near future.

Cabrera Services, Inc. believes these corrective actions will prevent any future omissions of Conditions 18A and/or 18B of our license.

Sincerely,

Paul H. Schwan C.H., C.S.P.
for

Henry W. Siegrist, PE, CHP
Corporate Radiation Safety Officer
Cabrera Services, Inc.