



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

January 14, 2011

REPLY TO A NOTICE OF VIOLATION

To Whom It May Concern,

Condition A. 11.B of NRC License No. 21-32239-01 authorized a specifically named individual to fulfill the duties and responsibilities of the Radiation Safety Officer (RSO) for the license.

1. Lawrence Tech believed they had an authorized RSO. The previous RSO left Lawrence Tech for employment elsewhere during the term of another Natural Sciences Department Chair and the new Department Chair was not aware there was a lapse in the institution having a responsible RSO.
2. Another faculty member was designated RSO immediately following departure of the licensed RSO, but Lawrence Tech. failed to amend the license.
3. Lawrence Tech. will terminate NRC licensure.
4. License will be Terminated by March 31, 2011

B. Title 10 of the Code of Federal Regulations (CFR) Part 31.5(c)(15) requires, with the exception of the devices listed in subparagraphs (i) and (ii), that any person who acquires, receives, possesses, uses, or transfers byproduct material in a device pursuant to a general license shall assure that the device is tested for leakage of radioactive material at no longer than 6 month intervals or at such other intervals as are specified on the label.

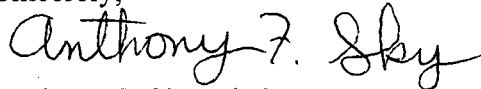
1. Lawrence Tech did not know the equipment had an electron capture detector with 15 millicuries of Ni-63.
2. The electron capture detector was tested October 26, 2010 and found to be in compliance.
3. A log book was created to keep track of testing frequency. The electron capture detector will be tested every six months. The next wipe test is scheduled for March 26, 2011.
5. The equipment was compliant October 26, 2010.

C. Title 10 of the Code of Federal Regulations (CFR) Part 31.5(c)(2) states, in part, that any person who acquires, receives, possesses, uses or transfers byproduct material in a device pursuant to a general license may not hold devices that are not in use for longer than 2 years. The testing required by paragraph (c)(2) of this section need not be performed during the period of storage only. However, when devices are put back into service or transferred to another person, and have not been tested within the required test interval, they must be tested for leakage before use or transfer. Devices kept in standby for future use are exclude from the 2-year time limit if the general licensee performs quarterly physical inventories of these devices while they are in standby.

1. Lawrence Tech believed that a stored detector was exempt from testing and was also unaware that there was a time limit on detector storage.
2. The detector was tested and found compliant on November 17, 2010.
3. The detector will be removed by a licensed carrier.
4. The detector will be removed by February 28, 2011.

Please feel free to contact me if you require any additional information.

Sincerely,



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