



AMERICAN
ENGINEERING
TESTING, INC.

CONSULTANTS
• ENVIRONMENTAL
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• MATERIALS
• FORENSICS

March 25, 2011

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DNMS

Ms. Vivian H. Campbell, Chief
Division of Nuclear Materials Safety Branch A
United States Nuclear Regulatory Commission
Region IV
612 East Lamar Blvd, Suite 400
Arlington, Texas 76011-4125

Re: Reply to a Notice of Violation
Report No. 030-34637/2010-003

Dear Ms. Campbell,

Per your letter dated March 7, 2011, American Engineering Testing, Inc., (AET) respectfully submits this written response to the United States Nuclear Regulatory Commission (NRC) - Region IV Inspection Report No. 030-34637/2010-003 and Notice of Violation.

The written response requires AET to provide your office with the following information.

1. The reason for the violation, or, if contested, the basis for disputing the violation or severity level.
2. The corrective steps that have been taken and the results achieved.
3. The corrective steps that will be taken.
4. The date when full compliance will be achieved.

The violation and AET's responses are set forth below:

Violation

Condition 11 of NRC License 22-20271-02, Amendment 10, states in part, that radioactive material shall be stored and used only at the following field station, 107 West Oak Street, Beresford, South Dakota.

Contrary to the above, from September 21, 2010 through December 13, 2010, the licensee stored and used radioactive material at a field station not authorized in Condition 11 of Amendment 10 to NRC License 22-20271-02. Specifically, the licensee stored, used, and dispatched licensed material from a facility located at 6608 East Seltice Way, Post Falls, Idaho, without amending its NRC license.

Radiography started at our Post Falls, Idaho facility as a temporary job site, dispatched from our licensed field station in Beresford, SD. The RSO interpreted the regulations to allow up to 180 days to request a license amendment to add the facility as a field station. Upon additional review, we understand that once the source was dispatched from the new facility, a license amendment was required to add the location as a field station.

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AET's Corrective Steps and Results Achieved

The RSO and regional manager have reviewed the definitions and NRC regulations relating to the requirements for temporary job sites and field stations.

On January 13, 2011, AET submitted a written request for a license amendment to add our facility at 6608 East Seltice Way, Post Falls, Idaho as a field station. Our request is currently being processed by NRC Region IV in Arlington, Texas.

AET's Corrective Actions to Avoid Further Items of Noncompliance.

AET is committed to complying with NRC regulations. Our RSO and regional manager have discussed the violation with the president of AET. In addition to the short term response to correct the violation, the RSO will review our violation and the requirements for temporary job sites and field stations for the entire radiography staff at our next annual safety refresher.

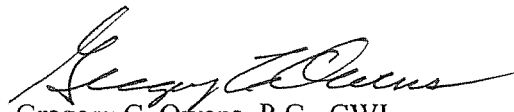
AET's Full Compliance Time Line

On January 13, 2011, AET submitted a written request for a license amendment to add our Post Falls, Idaho facility as a field station. We received written confirmation dated February 28, 2011 that our request had received initial processing and administrative review and there were no administrative omissions.

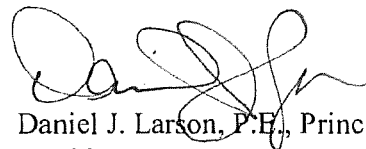
On March 23, 2011, NRC Region IV staff informed us our amendment should be received by May 1, 2011.

If you need additional information or have questions in regards to this correspondence, please feel free to contact me at any time.

Sincerely,
American Engineering Testing, Inc.



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cc: US NRC
Attn: Document Control Desk