



DEPARTMENT OF THE ARMY
UNITED STATES ARMY TACOM LIFE CYCLE MANAGEMENT COMMAND
6501 EAST 11 MILE ROAD
WARREN, MICHIGAN 48397-5000
April 28, 2011

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Docket No. 13077
Washington, DC 20555-0001

SUBJECT: Reply to Notice of Violation (NOV), EA-11-048, Docket 13077

As required per 10 CFR Part 2.201 the licensee, U.S. Army TACOM Life Cycle Management Command (LCMC) provides the following information regarding the NOV issued on March 29, 2011.

1. Reason for Violation.

The incident was reported to the NRC on January 10, 2011 because official wipe test results were not received validating that this was a NRC reportable event until January 10, 2011.

2. Corrective steps that have been taken and results received.

We have implemented a policy effective April 1, 2011 requiring reporting of reportable events based on preliminary wipe tests versus official wipe tests. The reporting will occur when contamination survey leak test results from the Army testing laboratory or other reputable source indicate that a reportable event has occurred. The official survey contamination results will be reported in the 30 day report to the NRC Region III Office.

3. Corrective steps that will be taken and results received.

We reviewed the circumstances that have contributed to this event and resulting NOV and have identified the following root cause findings:

Lack of procedures specifically identifying the level of test result verification needed for reporting to the NRC: Because procedures were not in place to specifically require that unofficial test results should be used to determine reporting requirements, a delay in reporting occurred due to the wait for official results.

We have implemented the procedure to use preliminary data from reliable test organizations to make decisions concerning whether the incident requires reporting to the NRC. Effective April 1, 2011, Incidents will be reported to the NRC when preliminary or official test data indicate that a reportable event has occurred.

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Lack of timely reporting of the incident to the licensee: Although this was not part of the NOV, this contributed to our failure to report the incident to the NRC within 24 hours of having preliminary test results indicating that this was a reportable event.

Our 30 Day Report provided a concise and accurate description of the incident and the procedures followed. As indicated in that response, our main concern was that the field had taken proper actions to protect individuals and prevent overexposure. After reviewing all factors, we are confident that this had been accomplished. One of our concerns as noted in our report was that the License holder of the commodity was not notified for several days after the event occurred. We have taken corrective actions to ensure that we are notified when an event occurs so we can meet reporting requirements.

4. Date when full compliance is achieved.

The policy to address the NRC notification discussed above has been implemented April 1, 2011.

The point of contact for further information is the undersigned at DSN 786-6194, commercial 586-282-6194, email george.g.jarvis@us.army.mil


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