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July 29, 2011

Mr. Patrick Loudon
Deputy Director Nuclear Materials Safety
Region III
Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

RE: Audit in Alaska July 27, 2011

Dear Mr. Loudon:

As discussed this afternoon by telephone, we are continuing our investigations into the events and reactions of our radiography crew that occurred in Alaska on July 27, 2011. Our immediate response includes the following provisions:

1. We take the actions of our personnel very seriously. While he is out of the office, we have been keeping John A. Newland, CEO, informed of the situation. Here at the Parma office, Mike Porter, VP of Operations, Bill Reeve, RSO, and Steve Flickinger, Safety Director have all had conversations with the radiographers as well as the site supervisor, Will Janin. We have spoken to each individually and explained that the behavior that was exhibited is intolerable. We expect and demand full cooperation from our personnel with all auditors.
2. Both radiographers have expressed their deep regret for their actions and they have each made a commitment to fully cooperate with auditors as well as maintain compliance with regulatory requirements and our procedures. They both freely admit that their actions were not appropriate.
3. We, as a management team, believe that the commitments made by Ryan Girdwood and Tim Goold are earnest and sincere. Each individual has historically given a high level of service. We feel that this event was an acute response to a surprise and will not be repeated.
4. Mobilization of a seasoned radiographer to replace Ryan Girdwood is happening immediately with arrival at Prudhoe Bay expected on Sunday. We are replacing Ryan as he was the lead technician and therefore had the primary responsibility.
5. Ryan will be returning to Michigan next week and he will complete evaluation and additional training at our office.
6. Will Janin has agreed to provide additional supervision, with periodic review of the crew onsite until Ryan's replacement arrives to assume control.
7. Bill Reeve and Will Janin will communicate on the present crew's progress and performance.
8. Tim Goold will be rotated out at the earliest opportunity.





9. Until the Ryan's replacement arrives, and under their confirmed commitment we will allow the present crew to continue performing radiography under Will Janin's guidance.
10. Our investigation is ongoing and we will have a full report for you when all details have been complied.

Thank you for your consideration and assistance in this matter.

Sincerely,

A handwritten signature in blue ink that reads 'William D. Reeve'.

William D. Reeve, RSO

A handwritten signature in blue ink that reads 'Steven C. Flickinger'.

Steven C. Flickinger, Safety Director

