



February 29, 2012

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

RE: Reply to a Notice of Violation, EA-12-002
License Number 25-15247-01

On August 30, 2011 the NRC conducted an inspection at our facility, City of Great Falls, Public Works Complex. On February 6, 2012 we received a Notice of Violation letter. There were two violations that were identified and have been corrected. The violations and corrective actions are listed below:

- The door to the room we store our portable gauges in had one lock. The room had one lock and is in our building, which is locked during non-business hours and our building is in a fenced complex which is locked during non-business hours, I thought this was secure. Since the inspection the door to the storage room has had an additional dead bolt lock installed on it, so it now has two separate locks.
- The shipping papers mistakenly had the wrong UN# on them. I have updated them to show the correct number, UN3332.

I am enclosing a photograph of the door to the portable gauge storage room showing the two locks and a copy of the shipping papers for your review.

If there is any other action needed to resolve these issues please let me know.

Sincerely,

Handwritten signature of Richard Johnson in black ink.

Richard Johnson
R.S.O./Civil Engineer

Sincerely,

Handwritten signature of David W. Dobbs in black ink.

David W. Dobbs, P.E.
City Engineer

cc. Regional Administrator
U.S. NRC, Region IV
1600 E. Lamar BLVD.
Arlington, Texas 76011-4125

IE07
RSHIV

BILL OF LADING

SHIPPER: City of Great Falls
1025 25th Avenue Northeast
Great Falls, Montana 59403

RADIOACTIVE MATERIAL, TYPE A PACKAGE, SPECIAL FORM, 7, RQ, UN3332
Am-241:Be 1.48 GBq (40 mCi)
Cs-137 0.3 GBq (8.0 mCi)

RADIOACTIVE YELLOW II LABEL, TI= 0.6

All packed in one Type A package.

******EMERGENCY CONTACT: (919) 839-2676 ******

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.


SHIPPER

NUCLEAR GAUGE EMERGENCY RESPONSE INFORMATION REQUIRED FOR
TRANSPORTATION

(Reference DOT p5800.5 ERG93, and 49CFR)

POTENTIAL HAZARDS

1) PROPER SHIPPING NAME

-RADIOACTIVE MATERIAL TYPE A PACKAGE, SPECIAL FORM, NON-FISSILE OR FISSILE-EXCEPTED, 7, UN3332 RQ

2) HEALTH HAZARDS

- Radiation presents minimal risk to lives of persons during transportation accidents.
- Undamaged packages are safe; damaged packages or materials released from packages can cause external radiation hazards. Contamination is not suspected.
- Packages (cartons, boxes, drums, articles, etc.) identified as "Type A" by marking on packages or by shipping papers contain non-life endangering amounts. Radioactive sources may be released if packages are damaged in moderately severe accidents.
- Packages (large and small, usually metal) identified as "Type B" by marking on packages or by shipping papers contain potentially life endangering amounts. Because of design, evaluation, and testing of packages, life endangering releases are not expected in accidents except those of utmost severity.
- Commonly available instruments can detect most of these materials.
- Water from cargo fire control is not expected to cause pollution.

3) FIRE OR EXPLOSION

- Packaging can be consumed without content loss from sealed source capsule.
- Radioactive source capsules and Type B packages are designed to withstand temperatures of 1475°(800°C).

EMERGENCY ACTION

4) IMMEDIATE PRECAUTIONS

- Priority response actions may be performed before taking radiation measurements.
- Priorities are life saving, control of fire and other hazards, and first aid.
- Isolate hazard area and deny entry. Notify Radiation Authority of accident conditions.
- Delay final cleanup until instruction or advice of Radiation Authority.
- Positive pressure self-contained breathing apparatus (SCBA) and structural firefighter's protective clothing will provide adequate protection against internal radiation exposure, but not external radiation exposure.
- CALL TROXLER ELECTRONIC LABORATORIES, INC. AT (919) 839-267 FOR EMERGENCY ASSISTANCE. OR QAL-TEK (208) 523-5557 / DALE SNOWDER (208) 745-7395

5) FIRE

- Do not move damaged packages; move undamaged packages out of fire zone.
- Small Fires: Dry chemical, CO₂ water spray or regular foam.
- Large Fires: Water spray, fog (flooding amounts)

6) SPILL OR LEAK

- Do not touch damaged packages or spilled material.
- Slightly damaged or damp outer surfaces seldom indicate failure of inner container.
- If source is identified as being out of package, stay away and await advice from Radiation Authority.

7) FIRST AID

- Use first aid treatment according to the nature of the injury.
- Persons exposed to special form sources are not likely to be contaminated with radioactive material.