

JANX Integrity Group
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July 20, 2012

Mr. Roy P. Zimmerman
Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

RE: Reply to Safety Related Notice of Violation and Proposed Imposition of Civil Penalties (EA-12-008)

Dear Mr. Zimmerman:

JANX Integrity Group has received and reviewed the "Safety Related Notice of Violation and Proposed Imposition of Civil Penalties dated June 25, 2012. Our response is as follows:

Violation 1(A): Violation of the two person rule

1. JANX admits that this violation occurred.
2. It is assumed that the violation occurred because the individuals performing radiography at this site willingly ignored their training, company rules, and the NRC regulations.
3. JANX relieved these employees of their duties and no longer employs them. JANX has sent notices out to all of our managers and employees to apprise them of this violation and emphasize that any violation of the NRC regulations will not be tolerated. We do not expect that this violation will occur again by our employees.
4. JANX has increased the number of auditors in the field and the frequency of the audits. Training has been enhanced to accentuate the two person rule and our annual refreshers are also addressing this issue.
5. Full compliance has been achieved as of the date of this letter.

Violation 1(B): Refusal to cooperate with NRC Inspector

1. JANX admits that this violation occurred.
2. It is assumed that the violation occurred because the individuals performing radiography at this site panicked when they saw the NRC inspector because they knew that they were caught in the act of violating several basic NRC regulations that they had been trained to obey.
3. JANX relieved these employees of their duties and no longer employs them. JANX has sent notices out to all of our managers and employees to apprise them of this violation and emphasize that any violation of the NRC regulations will not be tolerated. We do not expect that this violation will occur again by our employees.
4. This incident will continue to be emphasized in future training and safety discussions. It has always been a part of our instruction manual but now it will be brought forth as a separate topic. All employees and Managers have been apprised of the violation and warned against violation of this regulation.

5. Full compliance has been achieved as of the date of this letter.

Violation II (A) Improper or no posting of radiographic areas

1. JANX admits that this violation occurred.
2. It is assumed that the violation occurred because the individuals performing radiography at this site willingly ignored their training, company rules, and the NRC regulations.
3. JANX relieved these employees of their duties and no longer employ them. JANX has sent notices out to all of our managers and employees to apprise them of this violation and emphasize that any violation of the NRC regulations will not be tolerated. We do not expect that this violation will occur again by our employees.
4. JANX has increased the number of auditors in the field and the frequency of the audits.
5. Training, including annual refresher, has added emphasis to posting requirements.
6. Full compliance has been achieved as of the date of this letter.

Thank you for your consideration and understanding in this matter. If you have any questions, please contact me at your convenience.

Sincerely,



John A. Newland
C.E.O. JANX Integrity Group

CC: Charles A. Casto
Regional Administrator
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352