



July 24, 2012

United States Nuclear Regulatory Commission  
 Region I  
 2100 Renaissance Blvd.  
 Suite 100  
 King of Prussia, PA 19406-2713  
 At: Craig Gordan

Re: License # 37-19062-01

LO

2012001

Docket No 3016010

## Response to a Notice of Violation

Dear Mr. Gordan:

This letter is in response to Trumbull Corporation's receipt of Safety Inspection Report and Compliance Inspection dated July 16, 2012. The noted issue was identified during the on-site inspection conducted on June 20, 2012 at the Mount Storm, WV facility and a follow-up discussion on July 12, 2012.

Trumbull Corporation management representatives, as well as a private health physics consulting company, have reviewed each item of non-compliance and provided the following documented response:

1. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11 (Violations and Corrective Actions)

Condition 15 of NRC License NO. 37-19062-01 requires that the licensee conduct physical inventory every six months, or at intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory and shall include the radionuclide, quantities, manufacturer's name and model number, and the date of the inventory.

Contrary to the above, as of June 20, 2012 the licensee did not conduct a physical inventory every six month to account for all sources and/or devices possessed under the license. Specifically, the licensee possesses eight Troxler Electronic Laborator

**NMSS/RGNI MATERIALS-004**



Inc. Model 3400 portable gauges and has not conducted a physical inventory since 2006.

In a follow-up discussion on July 12, 2012, the RSC indicated the required inventories would be performed every six months together with required leak tests, and provided a copy of the form to be used for each inventory.

Trumbull Corporation Response

Trumbull Corporation acknowledges that physical inventories were not completed every six months in accordance with the license condition. The RSO or designee shall ensure that these inventories are completed every six months and the records maintained as required.

As per your discussion with Todd Mobley of Applied Health Physics, Inc. last week Trumbull Corporation wishes to confirm that our inventory consists of the following :

#	Manufacturer	Model
5	Troxler Electronics Laboratories	3400 Series
3	Humboldt Manufacturing	5001 EZ

Any questions regarding this correspondence should be forwarded to the attention of Trumbull Corporation.

Chad Lincoln  
Area Safety Manager  
Trumbull Corporation