



BOX 19034 FERRANDEZ JURCOB STATION SAN JUAN PR 00910-1934 TEL: (787) 268 3516 / 268 3517 FAX: (787) 268 3609

August 13, 2012

Mr. Blake Welling
Nuclear Regulatory Commission
Region I
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

G2
52-31446-01
IR03038463-
12-001

Re: Response to Inspection and Notice of Violations.

Dear Mr. Welling:

The following specific corrective actions have been taken in response to your inspection of June 25, 2012 and the Notice of Violation of July 2, 2012.

1. We have conducted the physical inventory. It will be performed every 6 months. Also, the audit of the program was undertaken. Note attached report and schedule.
2. The gauges have been tested for leakage. Note attached reports and schedule.
3. The employees have received the required HAZMAT training course. Note attached certificates.
4. In addition, the survey meter has been calibrated, the notice to employees has been posted, the certificate of competent authority for sealed sources is available and the shipping papers have been updated.

Respectfully,

Ivan Usero Perez
Ivan Usero Perez
President
Geopractica, Inc.

NMSS/RGNI MATERIALS-004

REC'D IN LAT 8-14-12

Radiation Safety Inspection
Portable Gauge Audit

Institution's Name Geo Practica

Date: 8 / 13 / 2013
Month Day Year

Performed by: David Rhoe

The following documents were reviewed and evaluated in regard to the NRC Regulations and conditions of the license:

ORGANIZATION

- | | | |
|--|----------------------------------|---------------------------------------|
| 1. Storage area changed? | <input checked="" type="radio"/> | No |
| ▪ Maximum dose rate at 1 meter from surface of storage area: <u>22.0</u> mR/hr | | |
| 2. RSO changed? | <input checked="" type="radio"/> | No |
| If RSO changed, does the RSO: | | |
| 1. Stop unsafe activities? | <input checked="" type="radio"/> | No NA |
| 2. Proper use & maintenance? | <input checked="" type="radio"/> | No NA |
| 3. Training of personnel (excess of 100 mRem)? | <input checked="" type="radio"/> | No NA |
| 4. Hazmat training (once every 3 yrs)? Date <u>Aug 2012</u> | <input checked="" type="radio"/> | No NA |
| 4. Possession of a radiation survey meter? | <input checked="" type="radio"/> | No |
| <input type="checkbox"/> Unit calibrated? Last calibration date: <u>Aug 2012</u> | <input checked="" type="radio"/> | No NA |
| 5. Personnel Dosimetry | <input checked="" type="radio"/> | No NA |
| 6. Inventory of Sources/leak test | <input checked="" type="radio"/> | No NA |
| 7. Posting of radiation signs - Notices
Notice to Employees, 206, and radiation signs ✓ | <input checked="" type="radio"/> | No NA |
| 8. Radiation Incidents (Reports) | Yes | <input checked="" type="radio"/> None |
| 9. Safe storage of radiation sources | <input checked="" type="radio"/> | No NA |
| 10. Shipper's papers | <input checked="" type="radio"/> | No NA |
| 11. Operation /Emergency procedures (Responsibilities of the Gauge Users)? | <input checked="" type="radio"/> | No NA |
| 12. 10 CFR regulations on file (Parts 19, 20, 21, 30, and 71) | <input checked="" type="radio"/> | No NA |
| 13. Ownership remained the same? | <input checked="" type="radio"/> | No NA |
| 14. Nuclear Gauge log book? | <input checked="" type="radio"/> | No NA |

15. Within NRC Authorized Limit Yes No NA
 22.5 mCi Ra-226 (4.5 mCi x 5)

16. Others: *26.50 mCi* Yes No NA

17. The following CPN AmBe/Cs sources were inventoried and leak tested.

Number	Model Number	Serial Number
<input checked="" type="checkbox"/> 1	C-200	Sn L-312
<input checked="" type="checkbox"/> 2	C-200	Sn L-504
<input checked="" type="checkbox"/> 3	C-200	Sn L-530
<input checked="" type="checkbox"/> 4	C-200	Sn L-572
<input checked="" type="checkbox"/> 5	C-200	Sn L-674
<input type="checkbox"/> 6		
<input type="checkbox"/> 7		
<input type="checkbox"/> 8		
<input type="checkbox"/> 9		
<input type="checkbox"/> 10		
<input type="checkbox"/> 11		
<input type="checkbox"/> 12		
<input type="checkbox"/> 13		
<input type="checkbox"/> 14		
<input type="checkbox"/> 15		
<input type="checkbox"/> 16		
<input type="checkbox"/> 17		
<input type="checkbox"/> 18		
<input type="checkbox"/> 19		
<input type="checkbox"/> 20		

Comments:

Management Signature: *Pravin Y. K.*

Management's corrective actions:

- 1.
- 2.

Leak Test Record
NRC License 52-25430-01

Leak Tested For: Geo Practica
Leak Tested By: David Rhoe

Standard Source: Cs-137 NES-139S
Standard Activity: 0.105 μ Ci Nominally
Date of Standard: 32395

Date of Leak Test: 4-Aug-12
Decay Activity: 0.06043 From decay chart
Standard (dpm): 134154.6

Instrument: Beckman Gamma
Instrument Model Number: 5500
Instrument Serial Number: 8044788

Standard (cpm) 34685
Efficiency: 0.25854 25.9 %
Counting time (minutes) 1
Background (cpm) 122
Minimum Detectable Activity: 2.721E-05

Wipe (Smear) Test. All external or accessible surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Ra-226 L-312	119	0.00021

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.


David Rhoe Health/Medical Physicist

Leak Test Record
NRC License 52-25430-01

Leak Tested For: Geo Practica
Leak Tested By: David Rhoe

Standard Source: Cs-137 NES-139S
Standard Activity: 0.105 uCi Nominally
Date of Standard: 32395

Date of Leak Test: 4-Aug-12
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Standard (dpm): 134154.6

Instrument: Beckman Gamma
Instrument Model Number: 5500
Instrument Serial Number: 8044788

Standard (cpm) 34685
Efficiency: 0.25854 25.9 %
Counting time (minutes) 1
Background (cpm) 122
Minimum Detectable Activity: 2.721E-05

Wipe (Smear) Test: All external or accessible surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Ra-226 L-504	137	0.00024

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.


David Rhoe Health/Medical Physicist

Leak Test Record
NRC License 52-25430-01

Leak Tested For: Geo Practica
Leak Tested By: David Rhoe

Standard Source: Cs-137 NFS-139S
Standard Activity: 0.105 uCi Nominally
Date of Standard: 32395

Date of Leak Test: 4-Aug-12
Decay Activity: 0.06043 From decay chart
Standard (dpm): 134154.6


Instrument: Beckman Gamma
Instrument Model Number: 5500
Instrument Serial Number: 8044788

Standard (cpm) 34685
Efficiency: 0.25854 25.9 %
Counting time (minutes) 1
Background (cpm) 122
Minimum Detectable Activity: 2.721E-05

Wipe (Smear) Test: All external or accessible surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Ra-226 L-530	118	0.00021

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations


David Rhoe Health/Medical Physicist

Leak Test Record
NRC License 52-25430-01

Leak Tested For: Geo Practica
Leak Tested By: David Rhoe

Standard Source: Cs-137 NES-139S
Standard Activity: 0.105 uCi Nominally
Date of Standard: 32395

Date of Leak Test: 4-Aug-12
Decay Activity: 0.06043 From decay chart
Standard (dpm): 134154.6

Instrument: Beckman Gamma
Instrument Model Number: 5500
Instrument Serial Number: 8044788

Standard (cpm) 34685
Efficiency: 0.25854 25.9 %
Counting time (minutes) 1
Background (cpm) 122
Minimum Detectable Activity: 2.721E-05

Wipe (Smear) Test: All external or accessible surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Ra-226 L-572	112	0.00020

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.


David Rhoe Health/Medical Physicist

Leak Test Record
NRC License 52-25430-01

Leak Tested For: Geo Practica
Leak Tested By: David Rhoe

Standard Source: Cs-137 NES-139S
Standard Activity: 0.105 uCi Nominally
Date of Standard: 32395

Date of Leak Test: 4-Aug-12
Decay Activity: 0.06043 From decay chart
Standard (dpm): 134154.6


Instrument: Beckman Gamma
Instrument Model Number: 5500
Instrument Serial Number: 8044788

Standard (cpm) 34685
Efficiency: 0.25854 25.9 %
Counting time (minutes) 1
Background (cpm) 122
Minimum Detectable Activity: 2.721E-05

Wipe (Smear) Test: All external or accessible surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured.

	Gamma	
Source ID and Serial Number	Wipe Test	Sample Activity
Ra-226 L-674	124	0.00022

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.


David Rhoe Health/Medical Physicist

	January	February	March	April	May	June	July	August	September	October	November	December
NG Cal L674								2011				
NG Cal L572 (*)							2011					
NG Cal L530			2007									
NG Cal L504								2011				
NG Cal L312 (*)									2006			
NG Leak Test L674		2013						2012				
NG Leak Test L572 (*)		2013						2012				
NG Leak Test L530		2013						2012				
NG Leak Test L504		2013						2012				
NG Leak Test L312 (*)		2013						2012				
SM Calibration								2012				
Hazmat (3 yr)								2012				
Annual Refresher												
Annual Audit								2012				
Employee Spot Checks												
Review Badge Reports		2013			2013			2012			2012	
Badge Annual Reports												

(*) Needs Repairs - Not in Use

CRMI

Consultores de Radiación Medica e Industrial NRC License 52-25430-01

This certifies that


Jesus M. Osario Pascual

Has successfully completed the courses entitled:

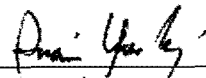
**Nuclear Gauge Certification,
Security for Hazardous Materials and
HAZMAT for Radiation Certification**

August 4, 2012

This course provides the continuing education requirements in compliance with the 49 Code of Federal Regulations Part 172.704 and the Nuclear Regulatory Commission NUREG 1556.


David M. Rhoe, MS, WSO-CIIME, WSO-CSI
Health Physicist/Medical Physicist

This certifies that the employee has been trained and tested, as required by 49 CFR 172.704.


Management

CRMI

Consultores de Radiación Medica e Industrial NRC License 52-25430-01

This certifies that

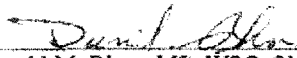
Ivan UseroPerez

Has successfully completed the courses entitled:

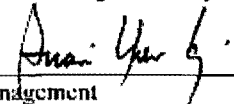
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Management