

## Stearns, Don

---

**From:** Zachary Worrell [ZWorrell@COLASKA.com]  
**Sent:** Friday, May 25, 2012 2:33 PM  
**To:** Stearns, Don  
**Subject:** Steps towards NRC compliance: Secon Construction, Juneau, AK

Don,

It has come to my attention, that you recently conducted an inspection of our materials storage area and radiation safety program at our Juneau, AK location. After speaking with Tim Dudley of Secon, I can gather that you were less than impressed with some aspects of our program.

As Secon's Radiation Safety Officer, it was never my intent to conduct operations, or allow operations to be conducted in which we were operating outside of the terms set forth in our NRC Materials License. As I believe you know, our full-time quality control manager left Secon in 2011, and we have yet to find a suitable replacement. Shortly after our QC manager left, we began to utilize third-party quality control services. As the interim RSO, I was both unfamiliar and seemingly too pre-occupied with other duties to give our radiation safety program my full attention. As a result of your visit to our site, I plan to be more responsible in my management of our materials storage, documentation, and compliance with regulations. Thus far I have taken the following measures to assure compliance and improve our program:

1. Sent letter to Roberto Torres of NRC requesting that our Ketchikan, AK operations area be included on our Materials License as a permanent materials storage area.
2. Procured new materials storage containers that will be used for the sole purpose of housing our nuclear densometers. Our Juneau, AK based nuclear gauges will now be locked, placed inside of their respective locked cases, which will be inside of a floor bolted and locked steel Knack box, which will be locked inside of a 20ft insulated nuclear materials storage container.
3. Restarted our quarterly dosemetry badge service.
4. Equipped our new nuclear storage area with inventory log.
5. Begin process of having each densometer calibrated and leak tested. On Wednesday, I sent our CPN serial number M340602103 densometer to Northwest Technical services to have these tasks performed.
6. Compiled in three ring binder, all documentation relating to the use, storage, and transportation of our nuclear densometer gauges. The binder contains the following tabs: densometer license, NRC reports, shipping documentation, checkout log, calibration/leak testing, dosemetry badge reports, radioactive signage, radiation safety program, 2006 application, NRC correspondence, and NRC regulations.

Moving forward (or until we can find a suitable replacement QC manager), I plan to take the following actions to assure compliance and improve our program:

1. Require all potential densometer users to go through a refresher course in the safe use and handling of nuclear densometer gauges in accordance with NUREG-1556
2. Relocate our new materials storage container to the area adjacent to our office. This should result in increased security, and will disallow the use of our storage container for anything except our nuclear densometers
3. Maintain an annual service/leak testing interval for each of our densometers.
4. Continue to maintain three ring binder containing all documentation relating to the storage, use, and transport of our nuclear materials.

I appreciate your consideration of our efforts to improve our level of compliance with NRC regulations. As stated above, I will do my best to ensure that we improve our processes and practices in the future.

Next week, I will depart for a remote construction project, but will be maintaining email communications. Given a few days of advanced notice, I could return to Juneau for a re-inspection of our documentation and materials storage facility if you deem necessary.

Please feel free to contact me to discuss these topics further. I can be reached at (907) 209-5875 (until 5/29/2012), or [zworrell@colaska.com](mailto:zworrell@colaska.com) (after 5/29/2012)

Thanks for your consideration,

Zack Worrell  
Project Engineer



Cell: (907) 209-5875  
Phone: (907) 780-5145  
Fax: (907) 780-5896