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August 23, 2012

Mr. Anton Vegel, Director  
United States Nuclear Regulatory Commission  
Region IV  
1600 East Lamar BLVD  
Arlington, Texas 76011-4511

Re: Procedural Changes Secon intends to implement to ensure compliance with NRC regulations

Dear Mr. Vegel,

Per your request this is my letter highlighting the actions SECON intends to take to ensure compliance with Nuclear Regulatory Commission (NRC) regulations.

**Management Education:**

In order to provide a level of oversight and understanding of the safe handling of our nuclear gauges, I plan to complete the online Troxler nuclear densometer course. Additionally, I will thoroughly review the information and requirements contained within our NRC materials license. This will aid in my understanding compliance and procedural elements and in turn allow me to comfortably identify and correct any deficiencies I may have previously overlooked while observing the handling and use of our nuclear densometers. The knowledge obtained from participating in the Troxler course and thorough review of our NRC materials license will also allow me to speak comfortably at all training meetings to all Secon management staff about our nuclear program, its requirements, procedures, and the importance of following protocol.

## **Management Oversight:**

Going forward, I plan to implement several oversight measures to ensure compliance from the management level.

- 1) Random visits to nuclear gauge storage location: I will ask our RSO for the key to the nuclear storage container. When I open the container, I will expect to find each container locked. Inside the gauge container, the gauge case should be locked, and inside the locked case, I should find the nuclear gauge with the source rod locked in the up position.
  
- 2) Random reviews of the nuclear program binder. Our RSO has updated this binder to include tabs for the following:
  - NRC License including amendments
  - NRC reports
  - Nuclear gauge shipping documents
  - Previous nuclear gauge checkout logs
  - Calibrations/leak tests
  - Self-audits
  - Badge exposure reports
  - Radioactive signs (for shipping gauges and placarding storage areas)
  - Radiation safety program operating procedures (laminated)
  - 2006 application
  - NRC correspondence including letters, newsletters, etc.
  - NRC regulations (CFR documents)

When I conduct a random review of this binder, I expect to find that the sections have been continually populated with up to date documents, entries, etc.

- 3) Random visits of construction sites where nuclear gauges are being operated. As mentioned above, the completion of the Troxler course will help me to further identify negligent or incorrect operation of a densometer in the field.

## **Procedural changes:**

Procedural improvements were also discussed during our pre-decisional conference. At this time, we are planning to implement the following procedures:

- 1) Prepare a list showing the proper procedure for checking out a nuclear gauge from the nuclear storage shed. This list will highlight on procedure associated with qualified personnel, checking in and checking out, locking/unlocking, sign-out, dos and don'ts for field use and field transport, emergency call list, etc. These procedural sheets will be laminated and placarded in each densometer box, and inside the storage location.
- 2) Scheduling of important inspection and reporting intervals. This includes annual leak tests for each gauge, inventory checks for periods of non-use, license renewal, self-audits, etc. At this time, we are exploring the possibility of using either Microsoft Outlook, or a program on our network server to schedule and establish these dates.
- 3) I will encourage and promote ongoing training for all Employees working with or around our densometers on a regular basis.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Dudley', with a stylized flourish extending to the right.

Tim Dudley  
General Manager  
Secon