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February 25, 2013

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Submitted to Overnight Delivery Address:
U.S. Nuclear Regulatory Commission
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11555 Rockville Pike
Rockville, MD 20852

**Re: Reply to a Notice of Violation
IR 03014020/2012001 (DNMS)**

To Whom It May Concern:

AECOM Technical Services, Inc. (AECOM) was inspected by the U.S. Nuclear Regulatory Commission (NRC) on November 9, 2012 at the AECOM-Vernon Hills, IL office and December 19, 2012 at the AECOM-Lansing, MI office. The purpose of the inspection was to determine if AECOM was performing its activities authorized under NRC License No: 048-18672-01 in accordance with NRC requirements. Findings of the inspection were discussed with AECOM by teleconference on January 17, 2013. Three Notice of Violations (NOVs) were noted in the subsequent NRC letter dated January 28, 2013 with all designated as Severity Level IV violations.

The specific violations and AECOM response to these violations are:

Violation A: *Title 10 of the Code of Federal Regulations (CFR) 30.34(c) requires each licensee confine its possession and use of byproduct materials to the locations and purposes authorized by the license.*

Contrary to the above, between May 2011 and December 26, 2012 the licensee failed to confine its possession of byproduct material to the locations authorized by the license. Specifically, the licensee possessed four moisture density gauges containing licensed material at 401 S. Washington Square in Lansing, Michigan, a location not authorized by the license.

Corrective Steps Taken: Based upon the completed inspections, AECOM prepared and submitted a license amendment request dated December 23, 2012 to the NRC to add the AECOM-Lansing, MI office as a permanent storage location to the license. However based upon ongoing office consolidation efforts and internal review of NDMG needs in the Lansing area, AECOM withdrew the license amendment request in a letter dated February 15, 2013. As part of this request, AECOM removed the four NDMGs currently located in the Lansing, MI office and transferred them to the AECOM-Marquette office, an approved permanent storage location. Additionally, AECOM completed the required steps to formally vacate the Lansing, MI office as a storage location.

Date Full Compliance Will Be Achieved: Full compliance was achieved on February 13, 2013 with transfer of the four NDMG to the AECOM- Marquette office and subsequent required testing of the AECOM-Lansing storage location on February 12, 2013. AECOM formally requested that the AECOM-Lansing, MI office be removed as a storage location on February 15, 2013. AECOM is awaiting NRC's approval that is expected to be received by March 8, 2013.

*LEO 7
RGM 3*

Violation B: *Condition No. 16 to the NRC License 48-18672-01 states the licensee shall conduct a physical inventory to account for all sealed sources and devices received and possessed under the license every 6 months.*

Contrary to the above, between August 2011 and November 2012, a period greater than 6 months, the license failed to conduct physical inventories to account for all sealed sources and devices received and possessed under the license. Specifically, the licensee failed to conduct physical inventories in August 2011, December 2011, and September 2012.

Corrective Steps Taken: *On December 4, 2012, a gauge inventory was completed by the RSO. Additional gauge inventories were completed on February 12 and 13, 2013 as part of the vacating of the Lansing, MI storage location and the audit of the Marquette, MI office. In an effort to insure that this oversight does not occur in the future, AECOM has mandated that January and July as 6-month inventory dates for all storage locations. If the standard inventory months are modified in the future, the reason for the change will be noted in the license files and will not exceed six months between the shifted inventory date and future inventories.*

Date Full Compliance Will Be Achieved: *Compliance was achieved on February 13, 2013.*

Violation C: *Title 10 CFR 20.1101(c) requires that the license periodically (at least annually) review the radiation protection program content and implementation.*

Contrary to the above, as of January 17, 2013, the licensee failed to review the radiation protection program content and implementation. Specifically, the licensee had not reviewed its radiation protection program since approximately December 2010.

Corrective Steps Taken: *AECOM completed an audit of the license on February 14 and 20, 2013 at the Marquette, MI and Vernon Hills, IL office locations, respectively. The audit utilized NUREG -1556, Vol. 1, Rev. 1 Appendix F "Portable Gauge Audit List" as the guideline. Audit summary letter along with any recommendations and actions will be maintained in the license files.*

The month of January each calendar year has been designated as the period for completing annual audits for the NDMG program.

Date Full Compliance Will Be Achieved: *Compliance was achieved on February 20, 2013.*

Other Items of Concern: *In addition, NRC management is concerned with the apparent lack of management oversight that appeared to be a contributing factor to the number and type of violations identified. While the day-to-day requirements of the program were being met, higher-level requirements were not being followed. Therefore, please describe what steps you will take in terms of management oversight of this program to reduce the likelihood of these or similar violations occurring in the future, specifically in light of your company's continued growth.*

Corrective Steps Taken: *AECOM strongly embraces safety and oversight of its licensed programs. AECOM is in the process of updating its portable nuclear density moisture gauge (NDMG) program that includes the direct management of AECOM's NRC License 48-18672-01. On February 1, 2013, AECOM designated Mr. Stephan Nalefski, Senior Vice-President,*



to be the Senior Executive Representative for direct communication between AECOM management and program personnel. Mr. Kenneth Bergschultz, PE has been designated as the Senior Program Manager, who will be responsible for the overall management of the program. Mr. Bergschultz is a trained RSO and has managed a similar NDMG program with multiple licenses across the continental US. Copies of the designation letters for these positions are attached.

AECOM takes the Notice of Violations very seriously and has implemented steps to bring the license into compliance. Significant management involvement has been implemented and will further enhance the quality of the NDMG program and license management. Based upon the responses provided, AECOM believes that it has thoroughly responded to the noted violations.

If you have any questions, or wish to discuss any of the responses further, please contact Mr. Bergschultz at (920) 451-2452 or through email at ken.bergschultz@aecom.com.

Sincerely,

Kenneth J. Bergschultz, P.E.
Senior Program Manager
NDMG Program

Stephan L. Nalefski, PG
Senior Vice President
Central Region Operations

Enclosures: As noted.

cc: Region Administrator, U.S. NRC Region III
Mr. Nash Doyle, AECOM
Mr. Jerome Russell, AECOM

February 1, 2013

Mr. Stephan .L Nalefski, PG
Senior Vice President
AECOM Technical Services, Inc.
27755 Diehl Road, Suite 100
Warrenville, IL 60555-3998

**Re: Designation Letter – Executive Management Representative
Central Region Portable Nuclear Density Moisture Gauge Program
AECOM Technical Services, Inc.**

Dear Mr. Nalefski;

This correspondence confirms your designation as the Executive Management Representative for the Central Region Portable Nuclear Density Gauge (NDMG) Program. Executive management support and involvement is key to a safe and successful program. This program includes portable NDMGs used for the purposes of measuring density and/or moisture in soil and asphalt materials. This program currently includes specific radioactive materials licenses:

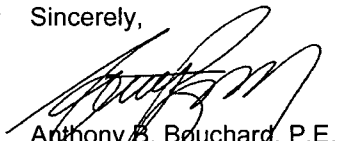
- Nuclear Regulatory Commission, License No.: 48-18672-01
- State of Illinois, License No.: IL-01562-01
- State of Iowa, License No.: 0322-1-07 PG
- State of Minnesota, License No.: 1194-200-89
- State of Wisconsin, License No.: 079-1308-01

In this role you are being delegated authority for all matters pertaining to the above licenses as well as any reciprocity requests or new licensing with other states or agencies which AECOM will be utilizing our Region's NDMG inventory. You may, and are encouraged to, designate a Senior Program Manager to manage the aforementioned licenses, and the program as a whole, as necessary to comply with regulatory and state specific requirements. It is also your responsibility to ensure that any issues of non-compliance with the various radioactive materials licenses are brought to the attention of relevant AECOM management and are addressed in a timely manner.

Please continue to work directly Mr. Nash Doyle, Central Region SH&E Manager to insure growth of our established safety culture in the program. Your continued focus on program safety and compliance is appreciated.

If you have any questions, please contact me accordingly.

Sincerely,



Anthony B. Bouchard, P.E.
Executive Vice President

cc: Mr. Nash Doyle, AECOM

February 1, 2013

Mr. Kenneth J. Bergschultz, P.E.
AECOM Technical Services, Inc.
4135 Technology Parkway
Sheboygan, WI 53083

**Re: Designation Letter - Senior Program Manager
Central Region Portable Nuclear Density Moisture Gauge Program
AECOM Technical Services, Inc.**

Dear Mr. Bergschultz;

This correspondence confirms your designation as the Senior Program Manager for the Central Region's Portable Nuclear Density Gauge (NDMG) Program. This program includes all management activities relating to the use, storage, licensing, purchase, disposal/transfer, file management, and training related to portable NDMGs used for the purposes of measuring density and/or moisture in soil and asphalt materials. This program currently includes specific radioactive materials licenses:

- Nuclear Regulatory Commission, License No.: 48-18672-01
- State of Illinois, License No.: IL-01562-01
- State of Iowa, License No.: 0322-1-07 PG
- State of Minnesota, License No.: 1194-200-89
- State of Wisconsin, License No.: 079-1308-01

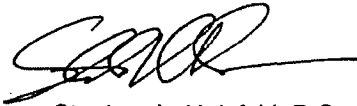
In this role we are also delegating authority for all matters pertaining to the above licenses as well as any reciprocity requests or new licensing with other states or agencies which will be utilizing our Region's NDMG inventory. Primary responsibilities include, but are not limited to, ensuring that all NDMG devices are leak tested at the required frequency (or more frequently as needed), six month gauge inventories and for conducting an annual review of each state NDMG program moving forward. It is also your responsibility to ensure that documentation associated with these tests, inventories and program reviews is maintained and regularly available.

As Senior Program Manager executive management has delegated approval to sign and submit requests (in addition to, or besides, the license RSO) as noted above. In addition you will have authority to appoint and remove all specific license RSOs associated with the program. You will continue to work directly with Mr. Steve Nalefski, Senior Vice President who is the designated executive management representative for this program and with Mr. Nash Doyle, Central Region SH&E Manager.

Your continued focus on program safety and compliance is noted and valued. If you have any questions, please contact Mr. Nalefski or Mr. Doyle accordingly.

Sincerely,


Anthony B. Bouchard, P.E.
Executive Vice President


Stephan L. Nalefski, P.G.
Senior Vice President

cc: Mr. Nash Doyle, AECOM
Mr. Tom Bader, AECOM