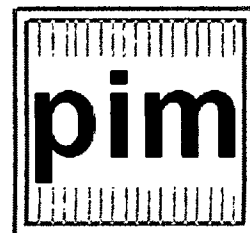


## Soil and Construction Materials Testing Laboratory

March 10, 2014



**DOCUMENT CONTROL DESK  
DIVISION OF NUCLEAR MATERIALS SAFETY  
U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, DC 20555**

**RE: REPLY TO A NOTICE OF VIOLATION:  
PIM ENGINEERING LABORATORY, INC., COTO LAUREL, PR  
LICENSE NUMBER: 52-24908-02  
DOCKET NUMBER: 03032940**

Nuclear Regulatory Commission (NRC) Document Control Desk:

This letter contains the responses to the two (2) Severity Level IV Violations that were identified by the NRC during an inspection to our facilities, records and procedures completed by Mr. Dennis Lawyer on January 28 and 29, 2014. The NRC Inspection Report Number is 03032940/2014001.

**A. 49 CFR 172.704 (a) and (c): Hazmat Employee Training**

Reason for Violation

PIM concurs with the NRC assessment with regards to the subject violation. The latter is related to the frequency of Hazmat Employee training that is provided to our employees. Although general aspects of the Hazmat training are part of radiation protection safety reviews (which are completed by PIM in more frequent periods), no formal training was provided within the required recurrent period of three (3) years.

It is evident that no effective reviews of the caducity of this training were performed by PIM. No date reminders and alerts were set on available schedule/calendar software.

Corrective Steps (Immediate and Long Term)

PIM hazmat employees will be receiving the corresponding training as offered by the American Portable Nuclear Gauge Association (APNGA). Technicians will complete this certification within the next ten (10) working days. Evidence of successful training and certification will be issued to the NRC in subsequent correspondence.

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**Laboratory Facilities in Ponce, Carolina and Aguadilla, Puerto Rico**

3009 San Cristóbal Avenue  
Coto Laurel, Puerto Rico 00780-2808

Tel. (787) 848-2075, Fax (787) 848-1562  
Email: jlipim@jlipim.com

IE07

March 10, 2014

Documents Control Team, Nuclear Regulatory Commission

Reply to a Notice of Violation: PIM Engineering Laboratory, Inc. (Lic. No. 52-24908-02)

In order to avoid future similar violations, the training certificate dates of each technician (Hazmat employee) will be posted on current scheduling/calendar software (eg. Google Calendar, Apple Inc.'s Calendar) with the corresponding alarms and alerts set to notify with three (3) months in advance of the renewal date. Furthermore, the review of training caducity will be part of the corresponding internal audits of our Safety and Quality Control Programs.

Resolution Date

PIM anticipates that this violation will be solved on or before March 31, 2014. Evidence of all approved training certificates will be issued to the NRC as reference.

**B. 10 CFR 20.1101 (c): Periodical Review Radiation Protection Program**

Reason for Violation

PIM concurs with the NRC assessment with regards to the subject violation. The latter is related to the frequency of the Radiation Protection Program training that is provided to our employees. The requirement is to provide with annual reviews of the Radiation Safety Program, where some of PIM's training intervals exceeded this criterion.

It is evident that no effective reviews of the caducity of this training were performed by PIM. No date reminders and alerts were set on available schedule/calendar software.

Corrective Steps (Immediate and Long Term)

PIM's nuclear gauge users will be receiving the corresponding training as offered by the American Portable Nuclear Gauge Association (APNGA). Technicians will complete this certification within the next ten (10) working days. Evidence of successful training and certification will be issued to the NRC in subsequent correspondence.

In order to avoid future similar violations, the training certificate dates of each nuclear gauge technician will be posted on current scheduling/calendar software (eg. Google Calendar, Apple Inc.'s Calendar) with the corresponding alarms and alerts set to notify with three (3) months in advance. Furthermore, the review of training caducity will be part of the corresponding internal audits of our Safety and Quality Control Programs.

Resolution Date

PIM anticipates that this violation will be solved on or before March 31, 2014. Evidence of all approved training certificates will be issued to the NRC as reference.

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March 10, 2014

Documents Control Team, Nuclear Regulatory Commission

Reply to a Notice of Violation: PIM Engineering Laboratory, Inc. (Lic. No. 52-24908-02)

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This concludes our response to the subject Notice of a Violation. Please refer to the enclosures of this document for additional information with regards to evidence of training courses enrollment.

Cordially,



José L. Irizarry-Rosa, MECE, PE  
Radiation Safety Officer  
PIM Engineering Laboratory, Inc.

Enclosures: Evidence of Training Enrollment with American Portable Nuclear Gauge Association (APNGA) On-line courses (Hazmat Refresher and Annual Radiation Protection Program Refresher, among others).

CC: William Dean, Regional Administrator  
U.S. NRC Region 1  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

info+apnga@mawebcenters.com  
To: jlirosa@jlipim.com  
Reply-To: memberships@apnga.com  
Online Order From APNGA On 2014-3-10 10:33:6

March 10, 2014 1:33 PM

Inquiries about your order should be sent to: memberships@apnga.com  
Online Order From APNGA  
(http://www.apnga.com)  
Order ID #14637899  
Time # 2014-3-10 10:33:3

Billing Information

Order Information

Jose Irizarry	SubTotal:	\$ 147.00
PIM Engineering Lab., Inc.	Discount:	\$ 0.00
3009 San Cristobal Avenue	Shipping:	\$ 0.00
Coto Laurel PR 00780	Handling:	\$ 0.00
US	Tax:	\$ 0.00
(787) 848-2075	Order Total:	\$ 147.00
jlirosa@jlipim.com	Payment Method:	Credit Card VISA

Shipment Information: No Shipping

Ship To:	Discount:	\$ 0.00
Jose Irizarry	Shipping:	\$ 0.00
PIM Engineering Lab., Inc.	Handling:	\$ 0.00
3009 San Cristobal Avenue	Tax:	\$ 0.00
Coto Laurel PR 00780		
US		
(787) 848-2075		
jlirosa@jlipim.com		

Qty	Unit Product Description	SubTotal
1	Group Multi-Class Discount Pack (5 people receive all classes - that's less than \$30 per person)	\$ 147.00

Instruction for item Group Multi-Class Discount Pack (5 people receive all classes - that's less than \$30 per person):  
Course enrollment is non-refundable after 30 days, or if any APNGA course materials have been accessed, whichever occurs sooner.

Your APNGA MULTI-GROUP Usernames and Numeric Passcodes will be emailed to you shortly after receiving your receipt for purchase your courses.

**IMPORTANT:** Once you receive your Usernames and Passcode login information by email, follow the instructions in the email to complete your enrollment registrations.

Protect your username and password information. The individuals you assign them to should not share them with anyone. Login and passcode information work as account serial number keys to provide access to courses, tests, and other resources.

info+apnga@mawebcenters.com  
To: jlirosa@jlipim.com  
Reply-To: memberships@apnga.com  
Online Order From APNGA On 2014-3-10 10:39:6

March 10, 2014 1:39 PM

Inquiries about your order should be sent to: memberships@apnga.com  
Online Order From APNGA  
(http://www.apnga.com)  
Order ID #14638113  
Time # 2014-3-10 10:39:3

Billing Information	Order Information
Jose Irizarry	SubTotal: \$ 147.00
PIM Engineering Laboratory, Inc.	Discount: \$ 0.00
3009 San Cristobal Avenue	Shipping: \$ 0.00
Coto Laurel PR 00780	Handling: \$ 0.00
US	Tax: \$ 0.00
(787) 848-2075	Order Total: \$ 147.00
jlirosa@jlipim.com	Payment Method:Credit Card VISA

Shipment Information: No Shipping

Ship To:	Discount:	\$ 0.00
Jose Irizarry	Shipping:	\$ 0.00
PIM Engineering Laboratory, Inc.	Handling:	\$ 0.00
3009 San Cristobal Avenue	Tax:	\$ 0.00
Coto Laurel PR 00780		
US		
(787) 848-2075		
jlirosa@jlipim.com		

Qty	Unit Product Description	SubTotal
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