

April 15, 2014

Director
Office of Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Geisser Engineering Corporation
Notice of Violation

Dear Mr. Zimmerman:

We are in receipt of your notice of violation regarding our company's use of nuclear density gauges within the jurisdiction of the Nuclear Regulatory Commission. We take exception to the reference that we deliberately engaged in this violation. As stated in our meeting on November 20, 2013, we noted to all those in attendance at the hearing, that we did not deliberately engage in this activity.

The fact that we kept accurate records of where the nuclear density gauges went and for what project is a clear indicator that we did not do this deliberately. If, it was deliberate, we would not of listed the jobs to which these devices went and performed the soil compaction tests.

We have since the beginning of April 2013 become acutely aware of the fact that there are agreement states and NRC states. Since that time we have not performed any of these services in Connecticut or on Federal Properties, such as Newport Navy Base, using the nuclear density gauges.

The fact that we were in violation of the Commonwealth of Massachusetts also was brought up to our attention and after meeting with their governing body, we agreed to a fine of \$25,000 plus. This was due to misunderstanding of the notification procedures for use of these devices in the Commonwealth. We have since conformed to their requirements and are still in the continuing process of paying down the fine.

As stated in my testimony back in November of 2013 we will not perform nuclear density gauge testing in any NRC or any non-agreement state. All those tests will be performed utilizing other methods for determining the in-place density of the soils. We take our commitment to conform to all the regulations very seriously and will continue to insure conformance.

We ask that the NRC look on our company's record of conformance, since the discovery of our meetings with all the parties involved in this matter. We ask that some relief be given to our company from the fine imposed by your organization. Please consider that we have been penalized by other entities for our misguidance in the use of the nuclear density gauges and are now in conformance.

If you should have any questions or we can be of any further assistance to you in this matter, please do not hesitate to contact us.

Very truly yours,

Geisser Engineering Corporation

George J. Geisser, III, P.E., RLS
President