



CHAMPION AEROSPACE, LLC

June 9, 2014

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attn: Document Control Desk

RE: Reply to a Notice of Violation
NRC Materials License No. 39-23825-01E

To whom it may concern,
Pursuant to the provisions of 10 CFR 2.201, Champion Aerospace, LLC is hereby submitting a written statement of explanation and corrective actions to the U.S. Nuclear Regulatory Commission regarding a Notice of Violation (Docket No. 03033459). During a NRC inspection conducted on May 1, 2014 one violation of NRC requirements was identified. This violation is listed below:

10 CFR 32.16 , states, in part, that each licensee shall maintain records of all transfers of byproduct material and file a report of transfer with the NRC covering the preceding calendar year on or before January 31 of each year in accordance with Items (a)(1) through (b)(3).

Records had been kept and were available for review, on site, for all transferred material however Champion had not submitted these records annually to the NRC. The notification/reminder to submit this report had been logged into Champions DataStream MP2 PM (Preventive Maintenance) System. This operating system failed and due to the age of the system, and lack of support from the supplier, we were unable to retrieve the archive of scheduled PM's. After many months of reviewing new PM systems Champion purchased KeepTrack, a Windows based system. This new system, being Windows based, is very easy to use and offers excellent customer support. Since all of the data was lost from the previous operating system we had to manually enter all of the scheduled PM's from memory and or copies from the old system. During this reentering of scheduled facility PM's the reminder to submit the annual NRC report was missed. As a corrective action Scott Wilson Scott Wilson, Health Physicist, Division of Nuclear Materials Safety, Division 1 witnessed the creation of the new annual PM (Champion #414). See attached copy of the completed PM.

Going forward, based on the KeepTrack PM system, a new PM will be generated to complete and submit the 2014 NRC annual report on 1/1/2015. This PM will be assigned to Alan Woods RSO with a completion date 1/31/15. Also an annual report was filed, with your office, on 5/20/14 for years 2009 through 2013 in order to get Champion up to date and in compliance with 10 CFR 32.16. Attached is a copy of the submitted annual report.

Champion assures the U.S. Nuclear Regulatory Commission that all corrective actions are in place and compliance was achieved with the submittal of the annual report on 5/20/14.

If there are any questions concerning this report please contact Alan Woods, Radiation Safety Officer at 864-843-7801.

1230 Old Norris Road
P.O. Box 686, Liberty, SC 29657-0686
Tel. (864) 843-1162 • Fax (864) 843-5414

IE07
FSME02
FSME



CHAMPION AEROSPACE, LLC

Sincerely,

A handwritten signature in black ink, appearing to read "Michael A. Runge". The signature is fluid and cursive, written over a light background.

Michael A. Runge
Director of Operations
Champion Aerospace, LLC

cc: Scott Wilson
Health Physicist
Division of Nuclear Materials Safety
Division I
scott.wilson@nrc.gov

Enclosures

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Preventive Maintenance - Current Record

6/9/2014 - 1 / 1

Champion Aerospace
 Facility
 NRC Yearly Reporting

Status : ok

P.M. ID 414

Completed: 1/1/2014

Next Due: 1/1/2015

1 Time Per Year

Assigned To: Alan Woods

Title/Craft: Mgr. Facilities, Piston Ops

Shift: Any

Info: **Submit Yearly NRC Report on Spark Gap Distrubtion. 10CFR32.16**

Action: **REPORT SUBMITTED TO NRC FOR YEARS 2009 - 2013**

People Min Per Unit = Man Hours

1 X 2 = 2.0 HRS

Next Due Reading:

Completed Reading: 0

Last Reading:

Last Read Date:

PM Cost:

Completed By Alan Woods Date 5/20/14 New Reading N/A

Qty Used	Part # or Int #	Part Descriptions	If Low Qty To Order