

То

ADVANCED SOIL ENGINEERING

GEOTECHNICAL CONSULTING ENGINEERS CONCRETE AND MATERIAL TESTING LABORATORIES

P.O. BOX 1286 ISABELA, P.R. 00662-1286

TEL: (787) 830-0366 FAX: (787) 830-8962

- : U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555
- From : Advanced Soil Engineering, Corp.
- Subject : Reply to a Notice of Violation
- : September 17, 2014 Date

In response to the August 19, 2014 Notice of Violation we have prepared the following enclosed reply. We understand the importance of complying with our license and the Code of Federal Regulations. We feel we have made significant strides to improve our program and insure compliance both now and in the future.

Sincerely,

Rafael González, R Advanced Soil Engineering, Corp.

Docket No. 030-34756 License No. 52-25436-01

Enclosure: Reply to a Notice of Violation

Cc w/Encl: Regional Administrator, Region I



REPLY TO A NOTICE OF VIOLATION

This is the information that you requested in response to the "Notice of Violation" that we received and dated August 19, 2014.

Violation A: Radiation Safety Program Issues

- 1. The violation is accepted as stated.
- 2. Reason for the violation: Not review the radiation protection program content and implementation annually.
- 3. Corrective action was taken conducting the Radiation Safety Program and a task was placed on an Outlook Calendar System for easy notification for Radiation Safety Officer and administrative assistant.
- 4. Date of full compliance was June 25, 2014.

Violation B: Physical controls to secure portable gauges

- 1. The violation is accepted as stated.
- 2. Reason for the violation: Did not use a minimum of two independent physical controls.
- 3. Corrective action was taken immediately with speaking to all of the authorized users and remind them of the requirement to secure the gate and door after placing portable gauges in the room for storage.
- 4. Date of full compliance was June 4, 2004.

Violation C: Refresher Training

- 1. The violation is accepted as stated.
- 2. Reason for the violation: The users (Hazmat employees), all authorized users had not received refresher training for a period of time in excess of three years.
- Corrective action was taken placing on an Outlook Calendar System for easy notification for Radiation Safety Officer and administrative assistant. The refresher training is on scheduled on mid-October by Mr. David M. Rhoe from CRMI.

Date of full compliance will be on October 18, 2014

Violation D: Leak Testing

- 1. The violation is accepted as stated.
- 2. Reason for the violation: There was an inattention to the details of the license conditions.
- 3. Corrective action was taken conducting the leak test of all gauges by Mr. David M. Rhoe from CRMI. With better knowledge of our license and conditions applications we put on Outlook calendar the time of renewal. As you mention the leak test frequency requirement for CPN Model MC-1 gauges is annual.
- 4. Date of full compliance was June 21, 2014.

ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS P.O. BOX 1286, ISABELA, PUERTO RICO 00662 Violation E: Check out/check in log

- 1. The violation is accepted as stated.
- 2. Reason for the violation: Failure to complete the gauge log book with all of the required information when signing the gauges out of and into storage.
- Corrective action was taken with the RSO speaking to the individuals involved and remind them of the requirement to completely fill out the information in the gauge log
- 4. Date of full compliance was June 5, 2014.

If you have any questions or need any further information, please feel free to contact me at the address above.

Sincerely,

Rafael González, RSO Advanced Soil Engineering, Corp.

LEAK TEST RECORD

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| Leak Tested For: | Advanced Soil | |
|--|------------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404.8 | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD80904543 | 126 | 0.00100 | 0.00021 |

David Rhoe Health/Medical Physicist

| Leak Tested For: | Advanced Soil | |
|--|------------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404.8 | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD90304916 | 129 | 0.00102 | 0.00022 |

David Rhoe Health/Medical Physicist

| Leak Tested For: | Advanced Soil | |
|--|-----------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404. | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD30607024 | 137 | 0.00108 | 0.00023 |

David Rhoe Health/Medical Physicist

| Leak Tested For: | Advanced Soil | |
|--|------------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404.8 | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD50207726 | 143 | 0.00113 | 0.00024 |

David Rhoe Health/Medical Physicist

| Leak Tested For: | Advanced Soil | |
|--|------------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404.8 | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD50207731 | 133 | 0.00105 | 0.00023 |

David Rhoe Health/Medical Physicist

| Leak Tested For: | Advanced Soil | |
|--|------------------|-----------------|
| Leak Tested By: | David Rhoe | |
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21-Jun-14 | |
| Decay Activity uCi (from decay chart): | 1.11665 0.05784 | |
| Standard (dpm): | 2478963 128404.8 | |
| Instrument used to count wipe sample: | Beckman Gamma | |
| Instrument Model Number: | 5500 | |
| Instrument Serial Number: | 8044788 | |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gamma | |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD60808431 | 118 | 0.00093 | 0.00020 |

This test reveals that 0.005 microcuries or less was present as removable contamination. Should the removable contamination exceed 0.005 microcuries, the source must be removed from use and necessary measures taken according to NRC regulations.

David Rhoe Health/Medical Physicist

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| Leak Tested For: Leak Tested By: | | nced Soil id Rhoe |
|--|-----------|---------------------------|
| Standard Source (NIST tracable): | Am-241 | Cs-137 NES-139S |
| Standard Activity (uCi): | 1.145 | 0.105 |
| Standard Date | 15-Nov-98 | 09-Sep-88 |
| Date of the Leak Test: | 21- | Jun-14 |
| Decay Activity uCi (from decay chart): | 1.11665 | 0.05784 |
| Standard (dpm): | 2478963 | 128404.8 |
| Instrument used to count wipe sample: Instrument Model Number: Instrument Serial Number: | Ę | an Gamma 5500 44788 |
| NIST Traceable Standard (cpm) | 141142 | 33915 |
| Counting Efficiency: | 0.06 | 0.26 |
| Counting Efficiency in percentage (%): | 5.69 | 26.41 |
| Counting time (minutes) | 1 | 1 |
| Background (cpm) | 118 | 118 |
| Minimum Detectable Activity: | 1.215E-04 | 2.620E-05 |

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Wipe (Smear) Test: All external or accessable surfaces of the source or housing are wiped with a piece of filter paper or other absorbent material which has been moistened with an appropriate solvent and the activity removed is measured. Note: Background counts were not subtracted form wipe test sample to calculate sample activity.

| | | Gan | nma |
|------------------------------|-----------|-----------------|-----------------|
| Source ID and Serial Number | Wipe Test | Sample Activity | Sample Activity |
| Am-241 & Cs-137 SnMD60808435 | 117 | 0.00093 | 0.00020 |

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David Rhoe Health/Medical Physicist

RADIATION SAFETY PROGRAM

Annual Review of Radiation Safety Program

10 CFR 20 Sub-part B — Radiation Protection Programs 20.1101 (c). The licensee shall periodically (at least annually) review the radiation protection program content and implementation.

1. Is a physical inventory performed every six (6) months and a record maintained for inspection? (If multiple gauges are possessed.)

□ Yes ⊠ No, If No, corrective action taken: Sime your juspection we conduct an Inventory Nuclear Gauge List enclosed

2. Are leak-tests performed on all gauges, including rental gauges, at intervals not to exceed one year and certificates retained for inspection for a period of three (3) years or until inspected, whichever is longer? Is a current leak test certificate in every gauge shipping container?

Yes X No. If No. corrective action taken: _____ visit and findings we conduc 41 19

3. Are entries made in the check-out/check-in log prior to/following transport and use at temporary job sites?

□ Yes ⊠ No, If No, corrective action taken: log at the gamae storage loca DENSONN vecov 100M 9 JALO

4. Are recipients licenses obtained to verify that possession is authorized, before transfer of gauges? Has a letter of receipt been obtained upon transfer of possession?

 \Box Yes \Box No, If No, corrective action taken: N/ABecause we don't trans the gauges t -U ANVONP

5. If a survey meter is specified as a license condition, is it calibrated annually and are calibration records retained for inspection?

require □ Yes ⊠No, If No, corrective action taken: <u>Durvey</u> M NAL LEVEL license Ne

6. Are gauges transported in compliance with 49 CFR (Title 49, Code of Federal Regulations), Transportation? This includes gauges tied down and locked, carrying a shipping paper, and Special Form and Type A Package Authorizations on file.

Ves IN No, If No, corrective action taken: Cauge 3 metal box, fied down and

Are personal dosimetry devices used in compliance with the conditions of the License? 7. Are dosimetry records preserved indefinitely?

X Yes I No, If No, corrective action taken: Have all employees received certification training and annual refresher training on the 8. safe and legal use of radioactive materials? Are records on file for inspection? Dres & No, If No, corrective action taken: <u>All employees has certific</u> but we failed to conduct refresher training oure has certification every three years. On March we conducted a veficilier training. 9. Are all procedures for the use, storage and possession of radioactive material in compliance with the conditions of the Radiation Safety Plan? Yes 🗆 No, If No, corrective action taken: _____ Are all gauges used, serviced, stored, and transported in compliance with the conditions 10. of the Radioactive Materials License? 11. Is all information on the radioactive material license current? ☑ Yes □ No, If No, corrective action taken: _____ Safety License No. 52-25436-01 JR/RSO:review-1.lic

Annual Review of Radiation Safety Program

10 CFR 20 Sub-part B — Radiation Protection Programs 20.1101 (c). The licensee shall periodically (at least annually) review the radiation protection program content and implementation.

1. Is a physical inventory performed every six (6) months and a record maintained for inspection? (If multiple gauges are possessed.)

🛿 Yes 🛛 No, If No, corrective action taken: _____

2. Are leak-tests performed on all gauges, including rental gauges, at intervals not to exceed one year and certificates retained for inspection for a period of three (3) years or until inspected, whichever is longer? Is a current leak test certificate in every gauge shipping container?

X Yes D No, If No, corrective action taken: _____

3. Are entries made in the check-out/check-in log prior to/following transport and use at temporary job sites?

X Yes I No, If No, corrective action taken:

4. Are recipients licenses obtained to verify that possession is authorized, before transfer of gauges? Has a letter of receipt been obtained upon transfer of possession?

□ Yes □ No, If No, corrective action taken: N/A Because we dou'+ transter the dances to anyone.

5. If a survey meter is specified as a license condition, is it calibrated annually and are calibration records retained for inspection?

XYes DNO, If No, corrective action taken: Calibration is up to late. Need calibration in a few daws.

6. Are gauges transported in compliance with 49 CFR (Title 49, Code of Federal Regulations), Transportation? This includes gauges tied down and locked, carrying a shipping paper, and Special Form and Type A Package Authorizations on file.

Yes I No, If No, corrective action taken:

7. Are personal dosimetry devices used in compliance with the conditions of the License? Are dosimetry records preserved indefinitely?

| X | Yes | | No, | lf | No, | corrective | action | taken: _ |
|---|-----|--|-----|----|-----|------------|--------|----------|
|---|-----|--|-----|----|-----|------------|--------|----------|

8. Have all employees received certification training and annual refresher training on the safe and legal use of radioactive materials? Are records on file for inspection?

XYes D No, If No, corrective action taken: Training refres current shall be made on 2012 as per r one every three years.

9. Are all procedures for the use, storage and possession of radioactive material in compliance with the conditions of the Radiation Safety Plan?

Yes D No, If No, corrective action taken: _____

10. Are all gauges used, serviced, stored, and transported in compliance with the conditions of the Radioactive Materials License?

X Yes D No, If No, corrective action taken:

11. Is all information on the radioactive material license current?

🛛 Yes 🗆 No, If No, corrective action taken: _____

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License No. 52-25430-01

JR/RSO:review-1.lic

Annual Review of Radiation Safety Program

10 CFR 20 Sub-part B — Radiation Protection Programs 20.1101 (c). The licensee shall periodically (at least annually) review the radiation protection program content and implementation.

1. Is a physical inventory performed every six (6) months and a record maintained for inspection? (If multiple gauges are possessed.)

X Yes D No, If No, corrective action taken: _____

2. Are leak-tests performed on all gauges, including rental gauges, at intervals not to exceed one year and certificates retained for inspection for a period of three (3) years or until inspected, whichever is longer? Is a current leak test certificate in every gauge shipping container?

× Yes Q No, If No, corrective action taken: The lock test is current at this time. Tenewed in Statember

3. Are entries made in the check-out/check-in log prior to/following transport and use at temporary job sites?

🛛 Yes 🗆 No, If No, corrective action taken:

4. Are recipients licenses obtained to verify that possession is authorized, before transfer of gauges? Has a letter of receipt been obtained upon transfer of possession?

TYes D No, If No, corrective action taken: N/A Because we lout the aduars to annone. vanster -

5. If a survey meter is specified as a license condition, is it calibrated annually and are calibration records retained for inspection?

Yes X No, If No, corrective action taken: <u>Calibration is out of date</u>. Need calibration

6. Are gauges transported in compliance with 49 CFR (Title 49, Code of Federal Regulations), Transportation? This includes gauges tied down and locked, carrying a shipping paper, and Special Form and Type A Package Authorizations on file.

🖄 Yes 🗆 No, If No, corrective action taken: _____

7. Are personal dosimetry devices used in compliance with the conditions of the License? Are dosimetry records preserved indefinitely?

🖄 Yes 🗆 No, If No, corrective action taken: _____

8. Have all employees received certification training and annual refresher training on the safe and legal use of radioactive materials? Are records on file for inspection?

XYes DNo, If No, corrective action taken: Training refresher i current. Shall be made on zorz as one every three years

9. Are all procedures for the use, storage and possession of radioactive material in compliance with the conditions of the Radiation Safety Plan?

X Yes D No, If No, corrective action taken:

10. Are all gauges used, serviced, stored, and transported in compliance with the conditions of the Radioactive Materials License?

X Yes I No, If No, corrective action taken:

11. Is all information on the radioactive material license current?

🛛 Yes 🗆 No, If No, corrective action taken: _____

License No. 52-25436-01

Nelson MUNOZ Gonzalez

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JR/RSO:review-1.lic

Annual Review of Radiation Safety Program

10 CFR 20 Sub-part B — Radiation Protection Programs 20.1101 (c). The licensee shall periodically (at least annually) review the radiation protection program content and implementation.

1. Is a physical inventory performed every six (6) months and a record maintained for inspection? (If multiple gauges are possessed.)

Marpe □ Yes XNo. If No., corrective action taken: system tor rdar easy for we couduc balled the Eventory DU 2013.

2. Are leak-tests performed on all gauges, including rental gauges, at intervals not to exceed one year and certificates retained for inspection for a period of three (3) years or until inspected, whichever is longer? Is a current leak test certificate in every gauge shipping container?

□ Yes K No, If No, corrective action taken: Devgonue いここう we can Ð. (CAR)

3. Are entries made in the check-out/check-in log prior to/following transport and use at temporary job sites?

X Yes I No, If No, corrective action taken: ive Sapak JVOVE o complete & CONCE

4. Are recipients licenses obtained to verify that possession is authorized, before transfer of gauges? Has a letter of receipt been obtained upon transfer of possession?

□ Yes □ No, If No, corrective action taken: <u>N</u> Kerquse we transter the gances

5. If a survey meter is specified as a license condition, is it calibrated annually and are calibration records retained for inspection?

>i MBillion Yes I No. If No. corrective action taken: colibra

6. Are gauges transported in compliance with 49 CFR (Title 49, Code of Federal Regulations), Transportation? This includes gauges tied down and locked, carrying a shipping paper, and Special Form and Type A Package Authorizations on file.

🞾 Yes 🗆 No, If No, corrective action taken: _____

7. Are personal dosimetry devices used in compliance with the conditions of the License? Are dosimetry records preserved indefinitely?

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| safe and legal use of ra | eived certification train | | |
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| Yes | u should a | ~ mid- add | oer by |
| Mr. David Rb | op from cr | MI.Full comp | lauce will be on 1 |
| Are all procedures for the compliance with the | | | ve material in |
| X Yes □ No, If No, co | rrective action taken: | | |
| Are all gauges used, so of the Radioactive Mate X Yes I No, If No, co | orials License? | | |
| | | | ····· |
| Is all information on the | radioactive material l | icense current? | |
| 🗹 Yes 🗆 No, If No, co | rrective action taken: . | | |
| · · · | | | · · · · · · · · · · · · · · · · · · · |
| | <u></u> | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | |
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| Zatuldana | t | | 0-25-14 |

GAUGE PHYSICAL INVENTORY

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ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS CONCRETE AND MATERIAL TESTING LABORATORIES

INVENTORY NUCLEAR GAUGE LIST

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: June 5, 2014 Gauge Quantities: _7___

| Model Number | |
|--------------|---|
| MD 80904543 | |
| MD 90304916 | ~ |
| MD 30607024 | ~ |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

Safety

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date:_____

Gauge Quantities:

| Model Number | |
|--------------|--|
| MD 80904543 | |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

Radiation Safety Officer



ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS CONCRETE AND MATERIAL TESTING LABORATORIES

INVENTORY NUCLEAR GAUGE LIST

Manfacturer's Name: CPN Radionuclide: Americium - 241 and Cesium - 137 Date: Feb. 29, 2012 Gauge Quantities: 7

| Model Number | |
|--------------|--|
| MD 80904543 | |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

icer Safety

Manfacturer's Name: CPN Radionuclide: Americium - 241 and Cesium - 137 Date: August 30, 2012 Gauge Quantities:

| Model Number | |
|--------------|----------|
| MD 80904543 | 1 |
| MD 90304916 | <i>✓</i> |
| MD 30607024 | V |
| MD 50207726 | V |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

Officer

Radiation Safety



ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS

CONCRETE AND MATERIAL TESTING LABORATORIES

INVENTORY NUCLEAR GAUGE LIST

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: <u>Feb. 25, 2011</u> Gauge Quantities: 7

| Model Number | |
|--------------|--|
| MD 80904543 | |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: <u>August 16,20</u> Gauge Quantities: ____

| Model Number | |
|--------------|--|
| MD 80904543 | |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |

Radiation Safety Officer



ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS CONCRETE AND MATERIAL TESTING LABORATORIES

INVENTORY NUCLEAR GAUGE LIST

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: <u>Feb 23, 2010</u> Gauge Quantities: ____

| Model Number | |
|--------------|----------|
| MD 80904543 | |
| MD 90304916 | <i>✓</i> |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | / |

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: August 31, 2010 Gauge Quantities: 7

| Model Number | |
|--------------|--|
| MD 80904543 | |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 50207731 | |
| MD 60808431 | |
| MD 60808435 | |



ADVANCED SOIL ENGINEERING GEOTECHNICAL CONSULTING ENGINEERS CONCRETE AND MATERIAL TESTING LABORATORIES

INVENTORY NUCLEAR GAUGE LIST

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: <u>Feb. zo, zoo9</u> Gauge Quantities: <u>7</u>

| Model Number | |
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| MD 80904543 | V |
| MD 90304916 | |
| MD 30607024 | |
| MD 50207726 | |
| MD 5020731 | |
| MD 60808431 | |
| MD 60808435 | |

Radiation Safety

Manfacturer's Name: CPN Radionuclide: Americium – 241 and Cesium – 137 Date: <u>August 24,200</u>9 Gauge Quantities: ר

| Model Number | r |
|--------------|------------|
| MD 80904543 | レ レ |
| MD 90304916 | V |
| MD 30607024 | <u> く </u> |
| MD 5020720 | ~ ~ |
| MD 50207731 | レ |
| MD 60808431 | |
| MD 60808435 | |

Radiation Safety Officer

RADIATION SURVEY METER

Universidad Central Del Caribe CRMI Survey Meter Calibration Service Instrument Calibration Report NRC License 52-25430-01

Calibration For:Advanced Soil EngineeringCalibrated By:David RhoeCheck Source ID:Sn 256356Check Source mR/hr:25 mR/hrCalibration Geometry:Perp

Insrtument:LudlumMod# 2401 EWSn 256356Calibration Source:Cs-137, Model # 77302, Serial # S-764Original mR/hr @ 1m:50.952Date of original mR/hr:27-Oct-99Calibration Date:11-Jul-14mR/hr @ 1m on Cal Date:36.26

| Scale mR/hr 2000 | Attenuator 1 4 | Distance meters | mR/hr Calculated 1600 400 | mR/hr Measured | Trigger +/- 20 Percent #VALUE! #VALUE! | Trigger Percent Avgerage #VALUE! | |
|------------------------|----------------------|--------------------|------------------------------------|-------------------|--|---|--|
| 200 | 1 4 | 0.48 0.48 | 160 40 | 160 45 | 1.00 1.13 | 1.06 | |
| 20 | 10 40 | 0.48 0.48 | 16 4 | 16 4.5 | 1.00 1.13 | 1.06 | |
| 2 | 100 400 | 0.48 0.48 | 1.6 0.4 | 1.6 0.45 | 1.00 1.13 | 1.06 | |
| 0.2 | 100 400 | | 0.16 0.04 | | #VALUE! #VALUE! | #VALUE! | |

The formula for % Error is (Measured/Calculated)

Trigger limit is +/- 20 percent (Corr Factors from 1.2 to 0.8)