



Pacific Geotechnical Engineers, Inc.

Soils & Foundation Engineering Consultants

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December 17, 2014

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

Subject: Reply to a Notice of Violation
Docket No.: 030-32852
License No.: 53-29047-01

Ladies and Gentleman:

This letter is a reply to three violations that were determined by NRC based on inspections conducted at our office on September 18 and 19, 2014. The violations included a failure to: 1) periodically review the radiation protection program content and implementation, 2) perform leak test of the Troxler gauges at the intervals specified in the certificate of registration, and 3) conduct physical inventory every six months.

Our responses and corrective actions to the violations are as follow.

- 1) Failure to periodically review the radiation protection program content and implementation.
 - a. *Reason for violation* – The 2013 review was not performed inadvertently.
 - b. *Corrective steps that have been taken and the results achieved* – A review was performed in 2014. Will ensure that review of the radiation protection program content and implementation be performed annually.
 - c. *Corrective steps that will be taken to avoid further violations* – Due dates for review have been added to our office program list as a reminder for the review. In addition, electronic reminders were set up to remind upcoming audit due dates.
 - d. *Date when full compliance will be achieved* – January 2015.
- 2) Failure to perform leak test of the Troxler gauges at the intervals specified in the certificate of registration
 - a. *Reason for violation* – The leak tests were not performed at the specified intervals by mistake.
 - b. *Corrective steps that have been taken and the results achieved* – Performed leak tests on both of our gauges on December 17, 2014.

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- e. *Corrective steps that will be taken to avoid further violations* – Due dates for leak tests have been added to our office program list as a reminder for the test. In addition, electronic reminders were set up to remind upcoming leak test dates.
 - c. *Date when full compliance will be achieved* – January 2015.
- 3) Failure to conduct physical inventory every six months.
- a. *Reason for violation* – The physical inventory was not performed semi-annually inadvertently.
 - b. *Corrective steps that have been taken and the results achieved* – Performed a physical inventory of the gauges in September 2014 and December 2014. Physical inventory will also be performed at the time of leak test in the future.
 - c. *Corrective steps that will be taken to avoid further violations* – Due dates for physical inventory have been added to our office program list as a reminder to perform the physical inventory. In addition, electronic reminders were set up to remind upcoming physical inventory dates.
 - d. *Date when full compliance will be achieved* – January 2015.

Please do not hesitate to contact the undersigned if there are any questions or if further information is needed.

Sincerely,

PACIFIC GEOTECHNICAL ENGINEERS, INC.

Kenneth Fan

Kenneth K. Fan, P.E.
Radiation Safety Officer

KF/KP(nrc ltr 2014-12-17)

Cc: Regional Administrator
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