



Advanced Corrosion Technology & Training/
Advanced Radiography Technologies
13087 South Hwy 288B, Suite A
Angleton, Tx. 77515

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-001

Re: Docket 030-38764
License # 42-35135-02

Reply to Notice of Violation

To whom it may concern,

I am writing in reference to the notice of violation that was written on 11-24-2015. If you have any questions regarding this response please feel free to contact me or my supervisor at the numbers listed at the end of this letter.

1) Failure to notify the NRC of conducting Radiographic operations or storing radioactive material for a period in excess of 180 days at a location not listed on the NRC license.

Reason: I have just recently taken over as the RSO on the NRC license for ACTT. I tried to do some research into how this happened and the only explanation that I have is that at one time ACTT was reciprocity under their Louisiana license in Wyoming. Once ACTT had an NRC license in Montana they worked under the NRC license and were returning to Montana. During that time frame there were several RSO changes. The original reciprocity was from Jason Hebert and then the license Number 17-35135-01 was issued to Larry Marks in July 2014.

Finally the current license was issued to our latest corporate RSO, Steve Campbell. From what I concluded the reason that the Lost Cabin's storage was not added to the license was because of the RSO turnovers and the going from reciprocity from Louisiana, then working from the Montana location and then finally being turned over to the new NRC license. Since I was not the RSO during this time in question I cannot explain all the issues or exactly why the Lost Cabins Wyoming site was not added as a storage site after the 180 days as required.

Corrective steps: Once the NRC identified that the Lost Cabin Wyoming site was not on the license, ACTT enlisted assistance from their consultant in ensuring the facility was adequate and getting everything we needed to send in to Region IV to have the facility added to the license. This was submitted to region IV, as well as a letter stating that the records storage would still be in Angleton, TX. The request was submitted on December 10, 2015.

Note: ACTT also sent in a request to terminate the Montana storage location and the crew in Wyoming will be supervised from the Angleton office on December 1, 2015.

Corrective steps to prevent this from occurring in the future: ACTT has a computer program in place with an RSO administrative assistant to keep it updated. This program will show all the reciprocity locations that ACTT is working in under any of our agreement state or NRC licenses. All ACTT RSO's will have access to this program so that they can see the timeframe we have worked or stored in any location other than one that is listed on the license. The administrator will have a program in place to let her know when ACTT has reached 125 days in any location. At this point, she will notify the RSO, whose crew is working there, and the RSO will be responsible for finding out the time duration of the job and if necessary, begin the paperwork to have the location added to the appropriate license. Any work in NRC jurisdiction must be approved by myself before work can begin and if it is necessary to have the site added then I will be responsible for performing that task.

ACTT has also contracted a radiation safety consultant, Laurie McGowen, to assist us with ensuring the program is in compliance as we continue to expand.

Date compliance achieved:

As mentioned above, ACTT has submitted the required documents to the NRC to add Lost Cabins as a storage location to our license as well as to close the Montana facility. I do not know when it will be added to the license, all the other items in this letter will be completed by December 31. 2015.

Respectfully,

Noe Chavarria

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