



April 12, 2016

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Document Control Desk

Reference: STV Incorporated - License No. 06-30049-01
Docket No. 03033206/2015001

Subject: Reply to a Notice of Violation dated March 14, 2016
STV Incorporated, Milford and West Haven, CT Sites

REC RG 1 04 15 16 AM 07 03

Dear Sir/madam:

STV Incorporated has reviewed the Inspection Report and Notice of Violation contained in the letter from Christopher Cahill, Region 1 Acting Chief dated March 14, 2016. The letter and Notice cited a weakness in our safety program and four Severity Level IV Violations. STV is committed to safety and to compliance with NRC regulations and licensed conditions. The following are our responses in accordance with the requirements of the letter and Notice of Violation:

A. A weakness in STV’s radiation safety program was identified by the inspector. *“The licensee did not perform an evaluation to determine the occupational dose of an individual that wore their personal dosimeter during a medical procedure or determine the circumstances behind radiation doses measured on spare personal dosimeters during three successive quarters in 2015.”*

STV will in the future determine the circumstances behind radiation dosage anomalies and report such determinations in our personnel dosimetry documentation.

B. Violations

1. *Failure to ensure that before using licensed materials, authorized users had successfully completed one of the training courses described in Criteria in the section entitled “Training for Individuals Working In or Frequenting Restricted Areas” in NUREG-1556, Volume 1, Revision 1 dated November 2001 (License Condition 19).*

Reason for the violation – STV’s Radiation Safety Officer (RSO) was not aware that personnel from our subconsultant firm on the inspection project were performing regulated activities for STV at the West Haven site. STV’s West Haven site Chief Inspector had verbally checked that subconsultant users were trained but did not obtain documentation.

Corrective steps and results – STV RSO implemented a new policy that no users outside of STV are allowed to perform regulated activities for STV without notifying the RSO.

Corrective steps to avoid future violations - RSO will document proper training for any person outside of STV prior to that person being authorized for the licensed activity.

Date when full compliance will be achieved – The New Policy was put into place in February 2016. No personnel outside of STV have been used for licensed activities since then.

2. *Failure to either maintain documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor (License Condition 19).*

Reason for the violation – STV’s Radiation Safety Officer (RSO) was not aware that personnel from our subconsultant firm on the inspection project were performing regulated activities for STV at the West Haven site therefore documentation of radiation dosage was not obtained or verified.

Corrective steps and results - STV RSO implemented a new policy that no users outside of STV are allowed to perform regulated activities for STV without notifying the RSO.

Corrective steps to avoid future violations - RSO will provide dosimetry to outside personnel prior to them performing licensed activities to document radiation dosage while performing work for STV.

Date when full compliance will be achieved – The New Policy was put into place in February 2016. No personnel outside of STV have been used for licensed activities since then.

3. *Failure to determine the occupational radiation dose received during the current year of each individual who is likely to receive an annual occupational dose requiring monitoring under Section 20.1502 (10 CFR 20.2104).*

Reason for the violation – STV’s Radiation Safety Officer (RSO) was not aware that personnel from our subconsultant firm on the inspection project were performing regulated activities for STV at the West Haven site therefore documentation of current year radiation dosage was not obtained or verified.

Corrective steps and results - STV RSO implemented a new policy that no users outside of STV are allowed to perform regulated activities for STV without notifying the RSO.

Corrective steps to avoid future violations - RSO will determine radiation dosage received during the current year for any person outside of STV prior to that person being authorized for the licensed activity.

Date when full compliance will be achieved – The New Policy was put into place in February 2016. No personnel outside of STV have been used for licensed activities since then.

4. *Failure to ensure all HAZMAT employees receive training required by 49 CFR 172, Subpart H, at least once every three years.*

Reason for the violation – STV’s Radiation Safety Officer (RSO) was not aware that personnel from our subconsultant firm on the inspection project were performing regulated activities for STV at the West Haven site. STV’s West Haven site Chief Inspector had verbally checked that subconsultant users had proper training but did not obtain documentation.

Corrective steps and results – STV RSO implemented a new policy that no users outside of STV are allowed to transport portable moisture density gauges on public highways for STV without notifying the RSO.

Corrective steps to avoid future violations - RSO will document proper HAZMAT training for any person outside of STV prior to that person being authorized to transport a gauge.

Date when full compliance will be achieved – The New Policy was put into place in February 2016. No personnel outside of STV have been used for transporting gauges since then

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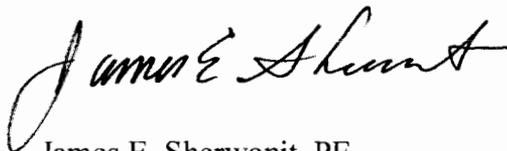
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Please contact me directly if you have any questions or require additional information concerning this request.

Very truly yours,

STV Incorporated

A handwritten signature in black ink, reading "James E. Sherwonit". The signature is written in a cursive style with a large initial "J".

James E. Sherwonit, PE
Vice President/Radiation Safety Officer

JES/az

CC:
U.S. Nuclear Regulatory Commission
Regional Administrator - Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713