

September 14, 2016

Jason C. Dykert
Health Physicist, Inspection Branch
US NRC, Region IV
1600 E. Lamar Blvd.
Arlington, TX 76001-4511

Subject: Addendum to Reply to Notice of violation, License number 49-26846-01

Dear Mr. Dykert:

As per our phone conversation yesterday, September 13, 2016, please find below the additional information you are requesting regarding ELI's initial reply to the March 1, 2016 Audit Inspection of Energy Laboratories, Inc. and subsequent Notice of Violation (NOV).

In our conversation yesterday, you mentioned ELI did not adequately address three issues spelled out in the August 9, 2016 NOV. These issues are explained below:

1. Reason for the violation: The NRC identified one violation pertaining to waste disposal by release to the sanitary sewerage noted during an inspection performed in March of 2016. NRC states that Energy Laboratories Inc. (ELI) disposed of specific licensed liquid waste that was not demonstrated to be soluble. Additionally, NRC states that the disposal records did not indicate the date, location and name of the individual who discharged the licensed material to the sanitary sewer. ELI acknowledges the violation and has taken the following corrective actions.
2. Corrective actions taken & planned: ELI is in the process of conducting a solubility filtration study to determine the solubility of the radionuclides discharged into the sanitary sewer. Drum waste is discharged on an as needed basis and includes a mixture of laboratory waste and unused environmental samples. This study will be conducted over the next three months to adequately obtain the representative radiochemistry of the discharged waste. A sampling and analysis plan has been written with specific instructions on how the filtration study will be carried out. This study has commenced.

In addition, each drum of unused samples and lab waste is currently being recorded on a form that includes the date the drum was filled, the laboratory work order numbers, the date it was discharged into the sewer, the location and the individual filling and/or emptying the drum. The records of disposal will be maintained by the RSO for not less than three years. The latter is to comply with ELI's License Condition 14 A to conduct our program in accordance our March 14, 2013 license application.

3. Corrective actions to prevent a recurrence: This information will be included in this year's revision of the Radiation Safety Manual and strictly enforced by the RSO with the backing of management. Following the completion of the solubility study, further action may be required.
4. Regarding the date of full compliance: ELI is committed to the date previously submitted in the original Reply to a Notice of Violation. We expect the solubility testing to be completed by December 31, 2016.



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I sincerely hope this has answered your questions and concerns. If not, please contact me immediately so I can make the appropriate changes.

Thank you.

Sincerely,



HSE/RSO

Steve Dobos
RSO

Digitally signed by
Steve Dobos
Date: 2016.09.14 13:18:32 -06:00