



Concrete Construction Corporation

802-863-6222 • Fax: 802-860-1528

www.sdireland.com

REC RG 11007*16 AM0631

TO: U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk, Washington, D.C. 20555

SUBJECT: REPLY TO A NOTICE OF VIOLATION

DATE: October 03, 2016

S.D. Ireland Concrete Construction Corporation South Burlington, Vermont

DOCKET No. 03036970

LICENSE No. 44-31063-01

RESPONSES TO VIOLATIONS FOLLOWING INSPECTIONS ON JUNE 20, 2016

A.

- 1) The reason for the violation pertaining to 10 CFR 20.1011 9(c) was simply because it was unclear on exactly what needed to be done as far as a "periodically review" of the radiation protection program content and implementation. Up until recent I, Nathan Parry (RSO) was the sole user of our one instrument (Nuclear Density Gauge, Troxler) and was the only one with access to it.
- 2) The corrective step we have taken is to issue and conduct at minimum an annual refresher class of the radiation protection program content and implementation with any certified users that has access to the instrument. A digital copy of the refresher/review will be archived.
- 3) To avoid further violations, a date will be saved specifically for this and an electronic reminder will be set.
- 4) S.D. Ireland will implement this refresher annually every December. If possible, a time will be set in the middle of the year as well.

B.

- 1) The reason for the violation of the License Condition 14 of NRC License Number 44-31063-01 was due to not knowing a type of record was needed to be kept, other than the leak test reports. As stated above, until recent, I Nathan Parry was the sole user of the instrument and was assumed anytime I used it, it was considered and counted as a physical inventory check. Unfortunately, I did not keep records of when it was conducted, other than density compaction reports.
- 2) The corrective steps we have taken are to physically inventory, inspect, and document the one instrument we own on a regular basis, at minimal intervals of every 6 months.
- 3) To avoid further violations, at minimum, an electronic reminder will be set to perform a leak test and inventory check. In addition to this we will continue to check-out/check-in the instrument every time we use it and keep records of this. Every time I, Nathan Parry use it, I will conduct an additional inventory.
- 4) This will be conducted ASAP and will be in full compliance by the end of October 2016.

Sincerely,

Nathan Parry, RSO