



May 22, 2017

U.S. Nuclear Regulatory Commission
Washington, DC 20555-001
ATTN: Document Control Desk

RE: Reply to a Notice of Violation for License No. 25-27524-01
Docket No. 030-33898

The purpose of this letter is to provide a written reply to the May 4, 2017 Severity Level IV Violation that Pioneer Technical Services received. This letter will discuss the reason for the violation, the corrective steps that have been taken and the results achieved, the corrective steps that will be taken, and the date when full compliance will be achieved.

Reasons for the violation:

After telephone conversations with the inspector, a review of the circumstances that led to the violation was conducted by the RSO. As part of the review, the lab team leader was interviewed to determine the reason for improper storage of the gauges. The lab team leader indicated that they were not aware that keys could not be left in the locks. The lab team leader has completed nuclear density gauge training and the training discussed proper storage of and levels of security for the nuclear density gauge. In addition, prior to amending the license the storage requirements were also discussed with the lab team leader. The lab technician was also interviewed as part of the review process. During the interview, the technician stated that one of the keys had been lost for the source handle lock. They stated that there was not an extra key therefore, the employees removed the lock. The training program was also reviewed to ensure storage and security requirements were addressed. The training program discusses the level of security required for storing when not under direct surveillance of an authorized user. However, the training does not specifically discuss leaving keys in locks. Upon completion of the investigation, the root cause for the violation was determined to be a misunderstanding of the storage requirements.

Corrective Actions taken:

An additional storage container (metal job box) was purchased the day after the inspection for the gauge that was not stored in a locked outer container. Additional locks that are keyed the same were purchased and extra keys were made for the locks. Each authorized user has a key and there is an extra key is secured in the lab team leader's desk. Current security/storage for each gauge includes the following:

- A lock on the source handle.
- A lock on the gauge case.
- The gauge is secured by a chain and lock inside of the job box.
- The job box is locked on the outside.
- Each job box is secured to an anchor point on the wall.

*IED7
RGN-IV*

Each authorized gauge user was required to complete additional training. The training material emphasized security/storage requirements and was updated to include removing the keys from the locks. A checklist outlining check out/check in requirements is being developed. The checklist will be posted at the storage location and will include requirements for securing the gauges when not in use. Finally, storage/security checks will be completed randomly throughout the year in addition to the annual program review.


Date full compliance will be achieved:

Training for all authorized users will be completed by 5/25/17. The check in/check out requirements checklist will be completed by 6/5/17. Random storage/security checks will be an on-going task.

If you have any questions or need additional information, please contact me at 406-497-8026.

Sincerely,

Tara N. Schleeman, CSP, RSO



cc: Regional Administrator
U.S. Nuclear Regulatory Commission Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511