

June 9, 2017

US Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC, 20555-0001

Re: NRC Inspection Report 150-00004/2017-003
Response to Apparent Violations, NRC Inspection Report 150-00004/2017-003; EA-17-027

Dear Sir:

This letter is in response to the Nuclear Regulatory Commission (NRC) Inspection Report 150-00004/2017-03 dated May 11, 2017 where the NRC conducted an unannounced inspection on January 12-13, 2017 and found five (5) apparent violations. The NRC has requested a response within 30 days of the referenced letter. Geo-Logic Associates (GLA) has chosen to respond to the apparent violations with this letter. Our response is as follows:

Violations 1, 2, & 3: 1 - Failure to limit activities involving radioactive materials in Non-Agreement States to 180 days in CY 2014.

2 - Possession and use of byproduct material except as authorized in a specific or general license issued in accordance with the NRC regulations, for CYs 2015 and 2016.

3 - Failure to file a submittal to the NRC at least three days before engaging in activities in NRC jurisdiction for the first time in CY 2017.

Reason: The project was originally to be completed within 180 days, but was extended. The requirement to extend GLA's reciprocity was inadvertently overlooked.

Corrective Actions Taken: GLA has submitted for and received reciprocity from the NRC, as of February 3, 2017.

Corrective Action to be taken: For future projects with reciprocity agreements, better communication between Radiation Safety Officers (RSOs) and Project Managers will be initiated so length of projects will be properly understood and calendar reminders (Microsoft Outlook) will be used to aid in timely action. Renewal of reciprocity will occur two (2) weeks in advance of the ending of the current reciprocity period. These policy changes have been added to GLA's Radiation Safety Plan.

Date for Full Compliance: As mentioned, reciprocity is current as of February 3, 2017. Discussions with management concerning these violations have been performed and project managers have been made aware to advise RSOs of future project extensions before current reciprocity has expired.

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Violation 4 – Failure to use a minimum of two independent controls that form tangible barriers to secure portable nuclear gauges from unauthorized removal, whenever portable nuclear gauges are not under the control and constant surveillance of the licensee.

Reason: GLA's on site personnel in Guam did not secure the portable gauge properly per GLA's Radiation Safety Plan.

Corrective Actions taken: Site personnel in Guam have secured the gauge properly by use of a locked door, gauge being chained to something substantial, and locks on gauge case and triggers. Site personnel were directed to review the Radiation Safety Plan and ensure compliance with all aspects of the plan including gauge storage.

Corrective Action to be taken: For future projects, GLA's RSOs will request periodic checks of tangible barriers by GLA's project managers that visit remote job locations.

Date for Full Compliance: GLA's Guam site personnel and management have been informed of the violations and corrective actions taken for full compliance.

Violation 5 - Apparent failure to provide gauge operators and field personal the training required by 49 CFR Part 172, Subpart H at least every three years.

Reason: GLA's Radiation Safety plan does include yearly informative training memos to gauge operators and field personnel of proper handling, storage, and shipping methods of gauges. GLA also requires completion of an eight (8) hour Hazwoper refresher course, but apparently did not include DOT specific training.

Corrective Actions taken: GLA has informed site personnel and management of these DOT refresher requirements.

Corrective Actions to be taken: GLA has instituted the required DOT training for field personnel, in accordance with 49 CFR Part172, Subpart H starting this year (2017). The Radiation Safety Plan has been revised to include the required DOT training.

Date for Full Compliance: Management has been informed and the refresher requirements have been instituted.

In conclusion, the projects on Guam and Saipan have been completed and GLA is in communication with a carrier to get the portable gauges back to California from Guam as soon as possible. However, GLA may request further reciprocity beyond June 30th, 2017 to allow the necessary time for shipping arrangements to be made.

We hope the above information is sufficient. Please let us know if you have any questions.

Sincerely,

Geo-Logic Associates, Inc.



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