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October 16, 2018

Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd.
Arlington, Texas 76011

Re: **Reply to Notice of Violation**
Docket No. 030-37816
License No. 17-29308-01

Concerning violation of 10 CFR 34.47 (g)(3), which requires, in part, that each alarming ratemeter used in industrial radiography must require special means to change the pre-set alarm function.

Violation is acknowledged. Intertek Asset Integrity Management utilizes the Mirion Technologies DMC 3000 Electronic Alarming Dosimeter (EAD) in its Texas and Ohio offices. During initial testing and training on the dosimeters, we found that the pre-set alarms could not be changed without performing a certain sequence of commands. These commands were the only way to enter the menu that allows the set points to be changed. This, along with the fact that Intertek did not provide instructions or documentation to employees to facilitate making changes to the set points. It was assumed that this was enough to comply with the regulations. During the July 2018 inspection, the NRC Inspector stated this may not satisfy the requirement of a special means to readily change the pre-set alarms. After back and forth conversations with the manufacturer, Intertek purchased a base module and software for the dosimeters. The base provides an interface with computer software to allow trouble shooting and review of dose activity on individual EAD's. Two autonomous parameters, dose alarm set point and dose rate alarm set point can be disabled by the software. In doing this, the ability to change the set points is removed from the EAD. It is still possible to see the set points, but manipulation of values is disabled. Corrected replacement units were immediately sent to the crews working in West Virginia. Verbal and written notices were sent to the manufacturer requesting all new EAD's ordered have been checked for compliance, before shipping to Intertek. As of now, all EAD's in Intertek's inventory have had these parameters removed. Moving forward, all orders and shipments for EAD's will go through the Longview Texas office. The units will be inspected to make sure they are operating within regulatory requirements.

There is only one base module in the company and only two individuals can issue PO's to purchase any equipment from Mirion Technologies. Close inspections of the EAD's will be required during field audits and when EAD's are turned in for calibration. Compliance is considered immediate.

If you have any questions or require additional information, please contact me at your earliest convenience.

Regards,

R. Alan Phillips
Corporate Assistant Radiation Safety Officer
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