

Bolger, Allyce

From: Jeff Spearman <jspearman@techcorr.com>
Sent: Monday, June 17, 2019 9:05 AM
To: Hill, Carol; Bolger, Allyce; Silva, Patricia
Cc: Walter Shaw; Ethan Shambles
Subject: [External_Sender] Response to Notice of Violation dated 5-22-19
Attachments: 2019 NOV Response-Gillette.pdf

Please accept TechCorr's response to Notice of Violation.

Ethan,
Print and file in folder labeled "correspondence to the Agency"

Thank You,

Jeff Spearman



CRSO
TechCorr USA
903-948-[REDACTED]

U.S. NRC
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

SUBJ: RESPONSE TO NOTICE OF VIOLATION
License No.: 42-29261-01
Docket No.: 030-37457

NRC Materials License 42-29261-01, Amendment 15, dated January 9, 2018, does not authorize the possession of Cesium-137 for use in calibration of licensee survey instruments and dosimetry equipment.

Contrary to the above, on October 23, 2018 and April 17, 2018, the licensee failed to limit its activities to those authorized on the license. Specifically, the licensee possessed a 150 mCi Cesium-137 source and used it to perform calibrations on survey instruments and dosimetry equipment at its facility in Gillette, WY. The licensee was not authorized to perform calibration activities or possess the 150 mCi Cesium source under NRC Materials License 42-29261-01.

1. The management of the TechCorr Gillette, Wyoming office had altered in the fall of 2018. The initial manager was promoted and reassigned to Colorado and a new division manager was hired for Gillette. The new manager struggled to prioritize the importance of maintaining calibrated equipment, ready for issue, for his radiographers. On two occasions (Oct & Apr) the Corporate Radiation Safety Officer (CRSO) had to drive to Gillette and perform calibrations to ensure all radiographic personnel had current calibrations on their equipment. The CRSO never meant to be in violation of the NRC Regulations.
2. Upon notification that the above listed action would result in a violation, the CRSO initiated:
 - a. NRC License amendment, dated 15 May 2019, requesting Cesium-137 be added to NRC License 42-29261-01 to facilitate calibration of survey meters and dosimetry equipment in NRC regulated territories.
 - b. Purchased additional survey meters and dosimetry equipment to maintain a fresh supply of ready for issue equipment.
 - c. Reinforced the previously existing shipping procedure for the manager to follow when shipping equipment to Texas for calibration.



3. With the above listed alterations to the Gillette, Wyoming office, TechCorr believes that this situation involving a violation will never happen again.
4. Full regulatory compliance will be achieved when TechCorr is granted authorization to possess Cs-137 for use in calibration procedures on NRC License 42-29261-01, Amendment #16.

Very Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey S. Spearman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Jeffrey S. Spearman
Corp. RSO
TechCorr USA, LLC