

GREAT LAKES ENGINEERING GROUP, LLC

July 16, 2019

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

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

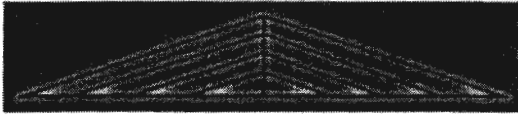
SUBJECT: REPLY to a Notice of Violation: NRC ROUTINE INSPECTION REPORT NO. 03038043/2019001 (DNMS) AND NOTICE OF VIOLATION – GREAT LAKES ENGINEERING GROUP, LLC

This reply letter is in response to the notice of violation letter dated July 11, 2019 where the following violations have been identified during a field visit to our Lansing office completed in April 12, 2019.

1. Per License Condition 15 of NRC License 21-32749-01: Great Lakes Engineering shall conduct a physical inventory every 6 months to account for all devices received and possessed under the license.
2. Per Title 10 of the Code of Federal Regulations (CFR) 20.1101(c) requires that licenses periodically (at least annually review the radiation protection program content and implementation.

In response to the 2 violations above, Great Lakes Engineering Group's explanation is below:

- a. **REASON FOR THE 2 VIOLATIONS:** Due to very limited/if at all use during the construction seasons of 2016 and 2017 and RSO staff change occurring in mid-2015, Great Lakes Engineering Group did not formally complete the physical inventory checklist every 6 months as prescribed in our license 21-32749-01. RSO did not complete prescribed checklist as stated in NRC License 21-32749-01 and was not aware this was formally required.
- b. **CORRECTIVE STEPS THAT HAVE ALREADY BEEN TAKEN:** Current RSO, construction division manager and all other management staff have been informed of this NRC violation following the field visit completed in April 2019 where this annual audit confirmation checklist was not completed or available during the NRC field visit. RSO, construction division manager and all other management staff reviewed annual audit checklist completed in prior years and determined logistics, understandability and improved work flow for updated process improvement. An immediate meeting between construction division manager, office manager and current Radiation Safety Officer was held shortly after this field visit and operational standards for the nuclear devices were discussed in detail for immediate



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implementation including updating the annual audit checklist to be used going forward. Process modifications to all direct and indirect staff have been communicated for immediate process improvement for policy enforcement requirements.

- c. **CORRECTIVE STEPS THAT WILL BE TAKEN:** Radiation Safety Officer will review the radiation protection program on a regular basis prior to and after the construction season shutdown and will perform an annual in-house Nuclear Gauge refresher training for ALL construction related staff to discuss process and procedures, objectives and NRC program compliance with respect to NRC license 21-32749-01. This meeting will also provide guidance to all management staff on expectations for oversight of nuclear gauge usage, compliance and procedural requirements per NRC license and Federal Regulations.
- d. Great Lakes Engineering Group is currently in full compliance and has checked all physical inventory as of May 31, 2019 per the 2019 Annual Checklist Form submitted to NRC June 5, 2019.

Sincerely,

GREAT LAKES ENGINEERING GROUP, LLC

A handwritten signature in cursive script that reads "Donovan Larkin".

Donovan Larkin, RSO

Docket No. 030-38043

License No. 21-32749-01

Te, Ryan

From: Donovan Larkin <donavan.larkin@glengineering.com>
Sent: Wednesday, August 21, 2019 11:10 AM
To: Draper, Jason
Subject: [External_Sender] RE: RE: Receipt of NRC Inspection Report and Status of Response for Great Lakes Engineering Group
Attachments: NRC Letter - Donovan_signed.pdf

Jason,

Here is the signed copy of "Reply to a Notice of Violation - Great Lakes Engineering Group". I was told by my Office Administrator that a paper copy was sent through the mail to the NRC on 08-01-2019. I guess it was never received. Sorry about that.

Donavan Larkin
Great Lakes Engineering Group

From: Draper, Jason <Jason.Draper@nrc.gov>
Sent: Wednesday, August 21, 2019 10:18 AM
To: Donovan Larkin <donavan.larkin@glengineering.com>
Subject: RE: RE: Receipt of NRC Inspection Report and Status of Response for Great Lakes Engineering Group

Donavan,

Thanks for sending your response. Could you please email me a signed copy so we have that for our records. Thank you.

Jason

From: Donovan Larkin <donavan.larkin@glengineering.com>
Sent: Tuesday, August 20, 2019 1:00 PM
To: Draper, Jason <Jason.Draper@nrc.gov>
Subject: [External_Sender] RE: Receipt of NRC Inspection Report and Status of Response for Great Lakes Engineering Group

I thought this document had already been sent to you. I guess it never got to you.

From: Draper, Jason <Jason.Draper@nrc.gov>
Sent: Tuesday, August 20, 2019 12:16 PM
To: Donovan Larkin <donavan.larkin@glengineering.com>
Subject: Receipt of NRC Inspection Report and Status of Response for Great Lakes Engineering Group

Donavan,

On July 11, 2019, we sent you a letter documenting the inspection I began back on April 12, 2019, and had an exit discussion with you on June 19, 2019. In the letter, we required a response to the associated Notice of Violation within 30 days of the date of the letter that included the reasons why the violations you were cited for occurred and details of the corrective actions you have taken and/or plan to take to correct the violations. As

of today's date, we have not received any response from you. Please get in touch with me to inform me of the status of your response. I also left a voicemail on your phone conveying the same message.

Thank you,

Jason Draper
Health Physicist (Inspector)
NRC/RIII/DNMS/MIB
(630) 829-9839
jason.draper@nrc.gov