

Girardeau Contractors, Inc.

P.O. Box 880

CAPE GIRARDEAU, MO 63702-0880

September 1, 1989

Mr. R. J. Caniano, Chief
 Nuclear Materials Safety, Section 1
 U. S. Nuclear Regulatory Commission, Region III
 799 Roosevelt Road
 Glen Ellyn IL 60137

RE: Notice of Violation
 Docket No. 030-30149, License No. 24-21044-02

Dear Mr. Caniano:

As requested by your correspondence dated August seventh, we are responding to the Notice of Violation and are offering the following comments.

1. We concur with your finding that our Portable Moisture/Density Gauge was transported without shipping papers on the two occasions mentioned. Being aware of this, corrective action was made a few days prior to the NRC inspection. Please refer to correspondence dated July fourteenth to our authorized user.

Also, Mr. Parker during the safety inspection informed us of a need to maintain test results on the transport package and the sealed sources as part of the shipping papers. To this end, we have contacted Campbell Pacific and they have sent these certifications. Therefore, we should now be in full compliance.

2. We agree that a physical inventory was not conducted and should have been. Since we have only one gauge and have no plans to acquire any others, the location of the gauge during the period has been known to us but without a record maintained. In one sense, our leak test certificate dated March eleventh, 1987 serves as an inventory at that time.

However, we understand that an inventory is necessary to document when the gauge was in storage. Further, it would have shown jurisdiction since we possess both NRC and Arkansas licenses.

Please refer to a log sheet included which has just been instigated and which will be maintained by the Radiation Safety Officer. We trust this should be sufficient for compliance.

SEP 6 1989

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GIRARDEAU CONTRACTORS, INC.

ASPHALT PAVING

P.O. Box 880
Cape Girardeau, MO 63702-0880
314/334-5261

QUALITY COSTS LESS

LETTER OF TRANSMITTAL

DATE	7/14/89	JOB NO	N.A.
ATTENTION	Mr. Bill Pruitt		
RE	Nuclear Gauge Shipping Papers		

TO: Delta Asphalt of Arkansas
P.O. Box 310
Truman, AR 72472

GENTLEMEN:

WE ARE SENDING YOU Attached Under separate cover via _____ the following terms:
 Shop Drawings Prints Plans Samples Specifications
 Copy of Letter Change Order

COPIES	DATE	NO	DESCRIPTION
1	7/14/89		Authorization Letter
1	No Date		Emergency Plan
1	3/03/89		Certificate of Leak Test
1			Arkansas ... Radioactive ... License, 3 Pages
1			NRC Materials License, 3 Pages

THESE ARE TRANSMITTED as checked below:

- For approval
- For your use
- As requested
- For review and comment
- FOR BIDS DUE _____
- Approved as submitted
- Approved as noted
- Returned for corrections
- Resubmit _____ copies for approval
- Submit _____ copies for distribution
- Return _____ corrected prints
- _____ PRINTS RETURNED AFTER LOAN TO US

REMARKS: We are required to carry the above packet of information as shipping papers while the nuclear gauge is transported. I am sure you are aware of this.

The emergency plan is from our NRC License. For Arkansas please amend the notifications as follows:

Arkansas Department of Health 501/661-2136
Arkansas State Police 501/736-3000
(Blytheville Headquarters)

COPY TO Shipping Papers File-

SIGNED: Thomas W. Moring
Radiation Safety Officer

If enclosures are not as noted, kindly notify us at once.

AN EQUAL OPPORTUNITY EMPLOYER

