

License No. 50-19380-01

NOV - 6 1989

R & M Consultants, Inc.  
P. O. Box 6087  
Anchorage, Alaska 99502

Attention: Mr. William A. Robertson, P.E.  
Vice President

Gentlemen:

Thank you for your letter dated October 10, 1989, informing us of the steps you have taken to correct items which we brought to your attention in our letter dated September 14, 1989. Your corrective actions will be verified during our next inspection.

In your October 10, 1989 letter and the letter enclosure requesting amendment to your license, you made reference to NRC approval for the use of "quarterly film badges" and "Albedo/TLD XBG/T.E. film badges."

Please be advised that under NRC licensing policy, film badges are to be exchanged monthly, whereas TLD badges may be exchanged quarterly, for processing by your supplier. This policy was discussed with Mr. S. Dombrowski, Radiation Protection Officer, during our recent inspection.

Amendment No. 5 to your license dated October 17, 1989, was issued with the understanding that you will now be using and exchanging TLD badges on a quarterly basis. If that is not your understanding, you should contact this office immediately.

Your cooperation with us is appreciated.

Sincerely,

*original signed*  
Robert J. Pate, Chief  
Nuclear Materials Safety and  
Safeguards Branch

bcc w/copy of letter dated 10/10/89:

file copy  
State of Alaska  
B. Faulkenberry  
J. Martin  
A. Johnson

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REGION V  
DSkov/dot  
11/3/89

*RD*  
RDThomas  
11/3/89

RJPate  
11/6/89  
*RJP*

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YES / NO ] YES / NO ] YES / NO ]

SEND TO PDR ]  
YES / NO ]

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*TEOS*



R&M CONSULTANTS, INC. 5084 CORDOVA # BOX 190087 ANCHORAGE, ALASKA 99519-0087 # PH 907-561-1733

ENGINEERS  
GEOLOGISTS  
PLANNERS  
SURVEYORS

October 10, 1989

R&M No. 950004

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

RE: Reply to Notice of Violation  
NRC Inspection of R&M Consultants, Inc.  
License No. 50-19380-01  
Docket No. 030-17516

Gentlemen:

In response to the NRC, Region V letter dated September 15, 1989, concerning the NRC inspection of our facility on August 14 and 18, 1989, R&M Consultants, Inc. hereby submits the corrective actions undertaken, and noted as follows in accordance with provision of 10 CFR 2.201, and as stated in Appendix A, Notice of Violation.

Appendix A.A.1. September 1, 1989, R&M Consultants sent a letter to the NRC requesting an amendment to our license. This change will delete William E. Patterson as the Radiation Protection Officer and assign this task to Steven J. Dombrowski. In the future, R&M will request this type of amendment to our license immediately upon changes within our staff that directly relate to the NRC license. R&M will be in compliance with this requirement upon approval of this requested amendment. Attachment No. 1 is a copy of the September 1, 1989 letter from R&M to the NRC.

Appendix A.A.2. At the time of the 1989 inspection, R&M did not utilize an official system to designate an authorized operator. Since the inspection, R&M has implemented a form letter in which the Radiation Safety Officer formally designates authorized operators. Attachment No. 2 is an example of the form letter currently utilized.

Appendix A.B.1. Due to administrative error, the documentation of physical inventories was overlooked during the dates indicated in the Notice of Violation. In an effort to avoid future violations of this nature, R&M has instituted a bi-monthly physical inventory program which is now in effect. During the 1989 inspection, it was brought to our attention that this

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violation is repetitive from the inspection conducted in August of 1984. R&M now recognizes this violation as a result of the 1989 inspection. Previous employees who were on hand at the time of the 1984 inspection left our employ shortly after the 1984 inspection. The laboratory personnel who took over management responsibilities were not made aware of the 1984 violations.

Appendix A.C.1. Again, in this violation, there is no obvious or assignable reason except administrative error for these two leak tests to exceed the required six month frequency. In an effort to avoid future violations of this nature, R&M has retained Troxler Electronics to provide leak testing services. With this program Troxler will send us a reminder card in the mail approximately one month in advance of the required leak test. This program is now underway.

Appendix A.D.1. It is correct that R&M switched to quarterly film badges in 1985 under the guidance of then Radiation Safety Officer, William E. Patterson. It is unknown to R&M at this time why Mr. Patterson changed our program without first gaining the approval of the NRC. This violation was brought to our attention as a result of the 1989 inspection. In our letter to the NRC dated September 1, 1989, R&M requested to amend our license to allow the use of quarterly film badges. In anticipation of amendment approval and as a result of conversations with Mr. Skov of your office, R&M instituted a quarterly program on September 25, 1989, which utilizes Albedo/TLD XBG/T.E. With regard to film badges not being exchanged promptly during the last quarter of 1988, it appears the problem was with the film badge vendor, Radiation Detection Co. R&M did not receive new badges during that time, hence, the badges were not exchanged. Toward the end of that quarter, Mr. Dombrowski of our office realized this problem and contacted the vendor, requesting that the film badge program be put back in operation.

Appendix A.E.1. There appears to have been a misunderstanding on the part of R&M personnel with regard to the need for the proper shipping papers when transporting the Troxler Model 3411B gauges locally. In order to avoid future violations of this nature, R&M has adopted a program where the laboratory manager uses a completed Hazardous Materials/Shippers Declaration for Dangerous Goods to document the dispatch and satisfy the requirements for local transportation of these gauges. This program was effective as of October 3, 1989.

In order to insure compliance with the required regulations, R&M has formed a review committee to perform bi-annual inspections of nuclear test gauge usage and procedures. The committee will consist of senior staff members that currently hold

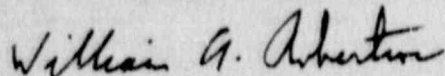
Nuclear Regulatory Commission  
Document Control Desk  
October 10, 1989  
Page 3

nuclear testing equipment certificates. The committee will include Mr. Charles H. Riddle who has been with R&M for over 15 years, and Mr. Robert L. Scher who has been with the firm for nearly 2 years. The bi-annual inspections will include a review of current instrument usage, storage, transportation and film badge requirements. A formal report will be written documenting each inspection and advising our Radiation Safety Officer of any violations of our license and required corrective actions. This report will be maintained within our files as verification of the inspections.

It is R&M's hope that this letter of response and the corrective actions taken satisfy the requirements of the NRC. Please do not hesitate to contact me with any questions or comments regarding this correspondence or our radiation safety program.

Very truly yours,

R&M CONSULTANTS, INC.



William A. Robertson, P.E.  
Vice President

WAR:SJD/rm

Attachments

xc: Mr. Robert J. Pate  
Chief Nuclear Materials Safety  
and Safeguards Branch  
Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, suite 210  
Walnut Creek, CA 94596



R&M CONSULTANTS, INC. 256 GARDNER - 304 2777 WASHINGTON BLVD. SUITE 1000 LOS ANGELES, CALIF. 90007-5611

ENGINEERS  
RADIATION  
PLANNERS  
CONSULTANTS

September 1, 1989

R&M No. 950004

United States Nuclear  
Regulatory Commission/Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596

ATTN: Beth Riedlinger

RE: Amendent of Materials License

Dear Ms. Riedlinger:

R&M Consultants, Inc. hereby requests to make the following change to our Materials License Number 50-19380-01 (Docket or Reference Number 030-17516):

Paragraph #12:

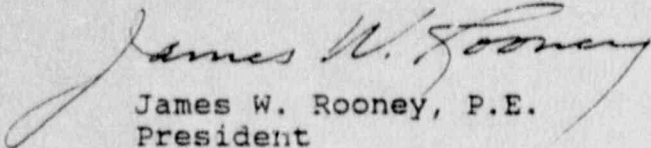
Licensed material shall be used by, or under the supervision and in the physical presence of, Steven J. Dombrowski; or other persons who have completed the manufacturer's training course, the State of Alaska, Department of Transportation and Public Facilities course, or the Morrison Knudson course, in the use of the devices and have been designated by Steven J. Dombrowski, Radiation Protection Officer.

Also, please be advised R&M Consultants has changed to the Albedo/TLD XBG/T.E. film badges on a quarterly basis. These badges will continue to be serviced by "Radiation Detection Company" of California.

Please feel free to contact me with any questions regarding our license.

Very truly yours,

R&M CONSULTANTS, INC.

  
James W. Rooney, P.E.  
President

JWR:SJD:tf

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R&M CONSULTANTS, INC. 8024 CORDOVA # BOX 190087 # ANCHORAGE, ALASKA 99515-0087 # PH 907-561-1733

ENGINEERS  
GEOLOGISTS  
PLANNERS  
SURVEYORS

Date 9/27/89

R&M NO. 950004

RE: Notice of Authorization

As per the Nuclear Regulatory Commission License No. 50-19380-01, the R&M Consultants Radiation Protection Safety Officer hereby designates David K. Johnson an authorized operator of the R&M portable moisture density gauges containing licensed material. This notice will be effective as of the date referenced above.

The gauges will be used in strict accordance with the NRC license and State and Federal rules and regulations.

*[Signature]*  
Radiation Safety Officer  
Signature

*David K. Johnson*  
Authorized Operator  
Signature