



# WILDER

WILDER CONSTRUCTION CO., INC.

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December 11, 1989

United States Nuclear Regulatory Commission  
1450 Maria Lane Suite 210  
Walnut Creek, Ca. 94596-5368

Attn: Mr. David Snow

Reference: License #50-23349-01

Gentlemen:

We are in receipt of your letter requesting additional information pertaining to our Notice of Violation dated September 14, 1989. Hopefully, this letter will clarify all outstanding issues.

The construction season in Alaska has wound down and we are now able to direct more attention to improving our Radiation Safety Program. The field duties of Wilder's RSO, Mr. Erickson, have decreased and I have instructed him to put the Radiation Safety Program as a priority among his duties this winter. Mr. Erickson has begun to develop a management system for use of our nuclear gauges in the future that will enable Wilder to avoid any problems in the future.

Addressing specifics of your letter, the inventory of the gauges will be conducted every six months and will be orchestrated by Mr. Erickson. Mr. Erickson will develop a checklist to indicate that the inventory has been done. The inventory will be done by Mr. Erickson or an authorized user and will be kept on file with the other R.S.P. records. The form is to record the date, gauge type & serial number, sealed source type, location, and whether the gauge is in use or stored. The form will be signed by the individual doing the inventory. The inventory system will be in-place by January, 1990.

The review of records to pinpoint the date of receipt for Wilder's gauges is not complete, but will be completed by the end of January, 1990. Upon completion, a record of receipt will be drawn up and a form will be developed to record any future receipt, transfer, or disposal of by product material by Wilder Construction.

Wilder Construction has received standard form shipping papers for transport of dangerous goods. Shipping papers will be made out and in the possession of the carrier of any of Wilder's gauges during transport. Prior to transport, Mr. Erickson will be contacted and will fill out the shipping papers for each move and ensure that the papers are included with the shipment.

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Letter U.S. Nuclear Regulatory Commission

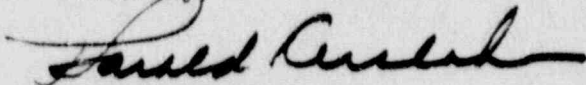
The overall management control system will be developed by Mr. Erickson and reviewed for approval by myself. Mr. Erickson and I have discussed different aspects of how to improve our management and are in the process of developing and implementing the system. We will have the system in-place for the next construction season. At this time, Mr. Erickson as RSO will be responsible for ensuring that the conditions of the license are met and the regulations regarding the gauges are followed. Mr. Erickson will report directly to myself. We will begin next year with a seminar at our annual meeting that specifically addresses proper use, transport and related activities of Wilder's gauges. The seminar will be to all individuals in Wilder's management as well as the foreman in charge of the field work. We hope to alleviate problems by making our workforce understand the seriousness of the Radiation Safety Program. The education program will be extended through individual meetings between Mr. Erickson and each individual authorized to use the gauges. As RSO, Mr. Erickson will continue his direct communication with the authorized users throughout the construction season to answer any questions and resolve problems quickly.

Wilder's records system will be set up in line with each item of our materials license and appropriate forms will be developed to keep complete records. In addition, a description of the requirements for each item of our material license will be developed to allow transfer of the responsibility of the RSO to occur without any break in the continuity of the Radiation Safety Program.

Our intention is to develop a system that is both clear and concise, but simple enough for the field employees to understand and to allow for efficient use of time. Our operation is not large enough to allow exclusive use of an individual's time for the Radiation Safety Program; therefore, our program must be compatible with other duties. Once our system is in-place, we will evaluate the time requirements and refine it as necessary.

We hope your concerns are satisfied.

Sincerely,



Harold Kerslake  
Vice President

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