

Dames & Moore



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July 7, 1981

United States Nuclear Regulatory Commission
Region V 1990 North California Blvd.
Suite 202
Walnut Creek Plaza
Walnut Creek, California 94596



Attention: Mr. G.S. Spencer, Director
Division of Technical Inspection

Gentlemen:

Re: License No. 53-19129-01
NRC Inspection

We have received your letter of June 26, 1981 with regard to routine safety inspection conducted by Mr. Grayson of your office on May 5, 1981, and the violations of our license that were identified at that time.

This letter provides written documentation as to response of Dames & Moore to correct the violations identified in your report.

Violation A concerned an unauthorized use of the nuclear density gauge on May 4, 1981. The individual utilizing the nuclear density gauge on that date stated that he had extensive experience in the use of nuclear testing methods. However, he was unable to provide a copy of a completed course certificate to our radiation safety officer. In addition, the individual is not listed on the Dames & Moore license. Effective on the date of the inspection, this individual was ordered not to utilize the gauge until a) he had completed a training course and provided our safety officer with a copy of the course completion certificate, and b) our license was adequately modified to include him as a certified user.

Violation B required us to conduct a physical inventory every 6 months to account for all sealed sources received and possessed under the license.

The single nuclear density gauge covered under our license is the only licensed source we possess. Therefore, the physical inventory is a relatively simple process, and we have begun to maintain a log of all sources contained under our license, and which we will update every six months as required.

Violation C indicates that a leak test had not been conducted on the source as required. We conducted a leak test on our gauge on May 5, 1981. The results of that test indicated no removeable Beta or Alpha activity.



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Violation D concerned the posting requirements of 10 CFR parts 19 and 20. These license and document posting requirements were complied with on May 6, 1981.

Violation E was the notice to employees form NRC-3 has been posted in the work area immediately adjacent to the storage location for our gauge. We posted the form on July 1, 1981.

Violation F concerned maintaining records showing radiation exposures of all individuals performing monitoring through the use of the source. The monitoring is done through the use of a photo badge film service. Records have been corrected to bring us into compliance. In addition we will continue the film badge service as required by our license.

We trust the above explanations provide sufficient information as to the corrective steps which Dames & Moore has taken to achieve full compliance with our license pursuant to Federal Regulations. We believe that we are in full compliance at this time.

Mr. Grayson's visit to our office was extremely beneficial in explaining directly the license requirements and recording/reporting procedures. Since the May visit, our radiation safety officer has placed increased emphasis on his role and made a concerted effort to gather all documentation and assure our continued compliance.

We trust the next inspection will demonstrate the benefits of these extra efforts.

Yours very truly,

DAMES & MOORE

A handwritten signature in dark ink, appearing to read "Donald F. Graf", written over the typed name.

Donald F. Graf
Technical Manager

DFG/nrr

cc: Earl Miyahira
Radiation Safety Officer