



United States Department of the Interior  
BUREAU OF RECLAMATION

YAKIMA PROJECT OFFICE  
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P.O. BOX 1749  
YAKIMA, WASHINGTON 98907-1749

September 17, 1981

IN REPLY  
REFER TO: 400  
472.

License No. 46-17645-01

U. S. Nuclear Regulatory Commission  
Region V  
1990 N. California Boulevard  
Suite 202, Walnut Creek Plaza  
Walnut Creek, California 94596

Attention: Mr. J. F. Pang, Radiation Specialist, Radiological  
Safety Branch

Gentlemen:

Subject: NRC Inspection, July 24, 1981, Notice of Violation

This statement has been prepared in response to a Notice of  
Violation dated August 21, 1981:

- A. License condition 13.A(1) requires that each sealed source containing licensed material, other than hydrogen-3, with a half-life greater than thirty days and in any form other than gas shall be tested for leakage and/or contamination at intervals not to exceed six months. Our records bear out that we have done the leak tests annually. There are many years when the gages are under snow for more than a six-month continuous period. In such events, the data gathered by the sensor would be destroyed or made invalid by excavating the snow from around the sensor. We will be writing to the USNRC License Management Branch, Division of Fuel Cycle and Material Safety in Washington, D. C., within the month to get our license amended. In this amendment, we will propose annual leak tests as are done by the Soil Conservation Service (SCS), who have identical gages installed in many locations in the western United States. In heavy snow cover areas such as the Washington Cascades, the requirement of a leak test every six months is impractical and we will seek a change in that requirement of our license.

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- B. License Condition 13.B requires that records of leak test results shall be kept in units of microcuries and maintained for inspection by the Commission.

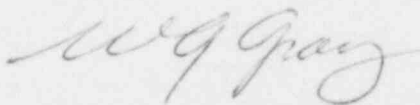
On the latter point, our files did not contain the leak test results which were, at the time of inspection, in a working status on the desk of our employee responsible for reporting. Hereafter, we will keep duplicate copies in our file.

- C. License Condition 16 states that the licensee shall conduct a physical inventory every six months to account for all sealed sources received and possessed under the license. The inventory list was kept in the technician's log and not in the license information file. From now on, a copy of the inventory will be kept in the central file along with license particulars also. We will, in the letter concerning our amendment, request that the inventory be done annually, concurrent with the leak test surveys.

Until the time that we have the amendments to the license, we will attempt to comply with the conditions of the present license without losing the snow water data needed from the stations. We feel that the information regarding water retained in the snowpack, and the interpretation of its effect on the runoff is good cause to support the 12-month revision of the requirement on leak test and inventory.

If you have further advice or need for information on this matter, please telephone Mr. Perala on 509-575-5840 or FTS 4465848.

Sincerely yours,



W. G. GRAY  
Project Superintendent