

GEO-ENGINEERING & TESTING, INC.

Geotechnical & Material Testing Engineers

No. 148 ASPINALL AVENUE
POST OFFICE BOX 3597
AGANA, GUAM 96910
TEL.: 477-8645, 472-6349
CABLE ADDRESS: GEOENG GUAM
TELEX NO: 721-6295 DONHO GM

8 December 1981

U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 260
Walnut Creek, California 94596

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

Gentlemen:

Re: NRC Inspection
License No. 56-18173-01

Pursuant to your letter to us dated November 5, 1981, we wish to make the following response:

Item A: License Condition 12 - Authorized Users - We have sent a letter to U.S. Nuclear Regulatory Commission, Director of Nuclear Material Safety and Safeguards, Washington D.C. on 4 December 1981, requesting amendment for our company to locally train and certify qualified users. A copy of this letter is attached as Appendix A.

Prior to the above letter, the authorized users have been amended to include the two users mentioned in your Notice of Violation, they are P. Padilla at Ponape and V. Cayaba at Palau. The amendment application was made on July 10, 1981 and was approved on September 14, 1981 as shown on Appendix B.

Item B. License Condition 13.A(1) - Leak Test - Leak test reports for Troxler Moisture/Density gauges serial numbers 6638 and 6639 dated August 12 and 28, 1981 respectively, are presented in Appendix C. At the time of inspection, these two reports were not presented to the inspector.

The next leak test would be made in January 1982 and every 6 months thereafter.

8112290420 811224
NMS LIC30
56-18173-01 PDR

- Item C. 10 CFR 20.203(e) - Signs - CAUTION RADIOACTIVE MATERIALS sign was posted in the soils laboratory hallway at the time of inspection. We have moved the sign to the glass wall at the entry of the room where the Troxler Moisture Density Gauges are stored.
- Item D. 10 CFR 19.11(a) - Documents - A notice describing the license, license conditions, amendments incorporated into the license, the operating procedures applicable to licensed activities, and where these documents can be examined has been posted in the soils laboratory. Similarly notice and documents have been posted and made available at the field sites in the U.S. Trust Territory of the Pacific Islands where the Troxler Moisture Density gauges are in use.
- Item E. 10 CFR 20.407 - Personal Monitoring Reports for calendar years 1978 and 1979 will be submitted once copies of the missing reports can be obtained from Radiation Detection Company (see Appendix D).


Management Control System - We have installed a new management control system including a complete new filing system for the license and related matters. We have also retained the services of Mr. William McAuliffe who is an electronic specialist well familiar with the Troxler Moisture Density Gauges that we are using. Mr. McAuliffe has also been given the responsibility of maintaining a full collection of files specifically related to the license and all related matters. Leak tests, signs, and other physical requirements will also be monitored and followed more closely. Mr. McAuliffe will report to Mr. Aster Ramos, company administrative assistant, and Mr. Ukrit Siriprusanan, company president and one of the safety officers, on a monthly basis in matters related to the license and licensed material (Troxler gauges). Mr. McAuliffe can also perform routine maintenance and general repairs of the Troxler gauges. By centralizing all the matters related to the license and the licensed material, we expect to maintain accurate and better records and avoid any future violation of the licensed conditions. Additionally, for future inspection, records will be readily made available under the new centralized management control.

We appreciate the inspection made by Mr. J. Frank Pang recently and the advice he gave us.

Please let us know if further response or actions are necessary.

Very truly yours,

GEO-ENGINEERING & TESTING, INC.


Ukrit Siriprusanan
President

Attachment