

CONSULTING GEOTECHNICAL ENGINEERS  
CONSTRUCTION MATERIALS TESTING  
EARTH INSTRUMENTATION  
EXPLORATION DRILLING  
MONITORING WELL CONSTRUCTION



P.O. BOX 266  
LEESBURG, VIRGINIA 22075  
Local (703) 777-0083  
Metro 478-8643  
FAX (703) 777-9573

June 25, 1990  
REPLY.NRC

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Subject: Licensee's reply to a notice of violation  
Docket No. 030-31230  
License No. 45-25061-01

Gentlemen:

The purpose of this letter is to acknowledge the violations noted in the letter dated June 14, 1990 by Mr. William E. Cline of the U.S. NRC division II office. Also, we describe the corrective measures we have taken to be in compliance with our license conditions and NRC requirements.

As directed by the letter, our reply to each of the three violations listed in Enclosure 1 - Notice Of Violation follows:

Violation "A" - Duties of Radiation Protection Officer were not being performed by the individual named in condition No. 11 of the materials license, or the individual named in the license amendment request dated February 9, 1990.

We admit the existence of this violation at the time of the inspection visit by Mr. Bermudez on May 16, 1990. This was due to rapid turnover in the job position given Radiation Protection Officer duties. To remedy this violation, we submitted a change to the February 9, 1990 license amendment, dated June 1, 1990, naming Mr. Paul Donahue as qualified Radiation Protection Officer and Mr. David Agee as an equally qualified alternate. Mr. Agee will assume the responsibilities of Radiation Protection Officer, described in item #10 of our original license application, in Mr. Donahue's absence. Also, he will provide continuity if Mr. Donahue resigns or is terminated. Our current license has been amended with this change and we are currently in possession of this amended license. Finally, we will exercise increased diligence in submitting timely license amendments and fee payments.

9007020177 900625  
REG2 LIC30  
45-25061-01 PDC

CORPORATE OFFICE: • 6001 LIVE OAK PARKWAY • NORCROSS, GEORGIA 30093 • 404-447-4665 • FAX 404-447-9079  
MARYLAND OFFICE: • 143000 CHERRY LANE COURT, SUITE 102 • LAUREL MARYLAND 20707 • 301-490-8065

IE07

110

Violation "B" - Radioactive sources were not being leak tested at intervals not to exceed six months as required by license condition No. 14.A.1.

We admit the existence of this violation. This also appears to be mostly due to the rapid turnover and lack of continuity in the position given Radiation Protection Officer duties prior to the most recent leak test date on February 12, 1990. To remedy this violation, we performed leak tests on all sources in our possession on June 19, 1990 and will designate the first work day of the month, beginning November 1, 1990 for leak testing all sources at five month intervals. A copy of the leak test schedule has been placed in the transport case of each of the Moisture/Density gauges containing the licensed sources. Also, a copy of this schedule is attached to our leak test results file folder so that it will be clearly seen by anyone reviewing the files.

Violation "C" - Radiation levels sufficient to produce a dose in excess of 2 millirems per hour were present outside the gage storage closet, an unrestricted area in violation of 10 CFR 20.105(b)(1) and (2).

We admit the existence of this violation at the time of the inspection visit by Mr. Bermudez. This condition was caused by a Moisture/Density gauge containing the sources being placed so that the shielded 10 mCi Cs 137 source was within 3" of the 3/8" plywood wall of the closet. This was remedied at the time of the inspection by simply rotating the case containing the gauge so that the end of the gauge containing the sources was moved from 3" to 18" from the closet wall. This lowered radiation levels at the walls to compliance levels. To prevent the recurrence of this violation, a prominent line has been painted on the closet floor at a minimum of 30" from the closet plywood walls and the unrestricted area. The line is marked with the following statement: "KEEP N-GAUGES BEHIND THIS LINE". All gauge users have been instructed to store the gauges behind this line at all times. Radiation surveys will be performed periodically, or if additional radioactive materials are stored in the closet. Based on survey results, suitable shielding will be added to the closet walls if needed to comply with the requirements of 10 CFR 20.105.

As of this date, we have performed all the corrective and preventative measures described above. To the best of our knowledge, we are now in compliance with the conditions of our materials license and the applicable NRC Rules and Regulations. In the future we will exercise greater diligence in maintaining compliance with NRC requirements.

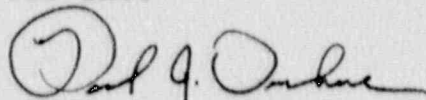


NRC Reply Letter  
June 25, 1990  
Page 3

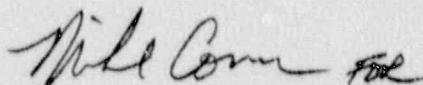
In closing, we have found the NRC Region II personnel, particularly Mr. Bermudez and Mr. Wright particularly helpful in resolving our issues of non-compliance. We look forward to their continued assistance with our NRC license requirements.

Respectfully,

CGC Inc.



Paul J. Donahue, Radiation Protection Officer



R. Kenneth Derick P.E., Branch Office Manager

Copy to: Regional Administrator  
NRC Region II