

Alt & Witzig Engineering, Inc.



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November 12, 1990

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Document Control Desk

RE: License No.: 13-685-01
Docket 030-14041

Gentlemen:

Enclosed is our reply to the "Notice of Violation" letter which was dated October 16, 1990, from your office.

During the last several months, we have had numerous discussions with members of the NRC staff regarding the apparent violations and corrective steps which have been taken. I thus have attempted to be brief in our enclosed reply.

We feel the imposed civil penalties may be excessive. However, we do not feel it would be beneficial to protest the penalties as addressed in your letter.

Enclosed is a check in the amount of \$2,500.00 to cover the penalties as presented in the violation notice.

If you have any questions regarding the attached "Reply to Notice of Violation", please contact us at your convenience.

Very truly yours,

ALT & WITZIG ENGINEERING, INC.

William E. Witzig
William E. Witzig, P.E.

WEW:smg
Enclosure

cc: Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137
ATTN: Mr. A. Bert Davis

OFFICES:
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2000302
SUBSURFACE INVESTIGATION AND FOUNDATION ENGINEERING
CONSTRUCTION MATERIALS TESTING AND INSPECTION
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IEIA
1/0
Check No 21326
\$2,500

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NMSS LIC30
13-00685-01

REPLY TO NOTICE OF VIOLATION

Alt & Witzig Engineering, Inc.
Indianapolis, Indiana

RE: License No.: 13-685-010
Docket: 030-14041

I. Alt & Witzig admits to the violations as stated below.

- (a) Violation associated with failure to control access to Licensed Materials.
- (b) Violation associated with transportation of Licensed Material.

Some of the particulars of these violations have been discussed and disputed, such as impaired cases.

II. The reasons for the violations can be summarized as follows:

- (a) A lack of monitoring our users and stressing to them the importance of following all safety requirements strictly. This led to users apparently not securing gauges as necessary.
- (b) Management did not totally understand regulations regarding shipping papers which were required in each vehicle transporting a gauge.
- (c) It was not outlined specifically to our users the detailed instructions regarding blocking and bracing. It had been presented to those users that the gauge must be "tied down" and secured. This was not in strict compliance with regulations.

III. Numerous corrective measures have been implemented to assure strict compliance with Nuclear Regulatory Commission regulations. These corrective measures were presented in our letter of September 27, 1990. We have also requested an amendment to our license, which changes the RSO for our safety program.

The most notable changes in our program are our newly established audit systems and the commitment at the administrative level to maintain a proper safety program.

REPLY TO NOTICE OF VIOLATION

Alt & Witzig Engineering, Inc.
Indianapolis, Indiana

RE: License No.: 13-685-010
Docket: 030-14041

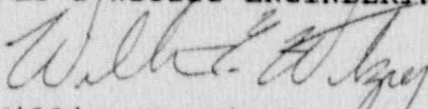
Since providing additional training, implementing the new controls, and establishing auditing procedures, our users and managers are now well informed and aware of applicable regulations. It is our belief that our gauges are now being used in compliance with the Nuclear Regulatory Commission regulations.

- IV. As previously discussed with your people, most of the corrective steps have already been implemented. However, presented with our letter of September 27, 1990 was our Amendment Request. This amendment designated Dr. Swapan Ghosh as our new RSO. At this time, we have not received official approval of this amendment.

Dr. Ghosh is prepared to implement our new audit system as well as presenting a renewed emphasis on compliance of the entire program from administrative staff to users. With these modifications we feel confident in future compliance of our Nuclear Regulatory Commission Safety Program.

- IV. Once the amendment to our license has been approved, our new RSO can then continue to establish the program and assure that full compliance has been achieved. It is our goal to have all responsibilities, monitoring, and records under the new RSO system within ten (10) days after approval of our amendment.

ALT & WITZIG ENGINEERING, INC.


William E. Witzig, P.E.