



ECB ENGINEERS, INC.

GEOTECHNICAL ENGINEERING CONSULTANTS

803 West Broad Street • Falls Church, Virginia 22046

Telephone: (703) 532-1066

EDWIN C. BEETHOVEN, P.E.

August 20, 1982

Mr. John A. Olshinski, Director
Division of Engineering & Technical Programs
United States
Nuclear Regulatory Commission
Region II
Suite 3100
101 Marietta Street, N. W.
Atlanta, Georgia 30303

Re: Report Number
45-19548-01/82-01

Dear Mr. Olshinski:

In response to your letter and enclosure Appendix A - Notice of Violation, dated August 16, 1982, the following is submitted.

As per this letter, we admit and agree upon the two stated violations Item (A) and Item (B) stated on the enclosure.

We admit violation Item (A) did occur on August 2, 1982. The data were in our office files and were not posted. We had posted only the Radiation Protection Program describing necessary procedures in case of an emergency. All the required documents are now posted at the office and in the shed where the gauge is stored.

We admit violation Item (B). The Troxler gauge has not been used since September, 1981, and has been in storage within a molded ABS Transport Case in a locked metal shed, about 1½ miles distant from the office. Since on occasion we would enter the shed, exposure meters were worn at those times of entry. Exposure dosimeter badges were submitted monthly to a testing laboratory, R. S. Landauer, Jr., and Company, for determination of current occupational radiation exposure. We have all records of such monthly dosimeter readings. These show exposures below minimum quantities measurable. Since the gauge was not being used, we inadvertently neglected to perform the required wipe test.

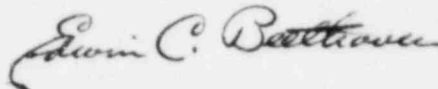
On August 2, 1982, immediately subsequent to Mr. L. A. Franklin's inspection, we performed the wipe test of our Troxler 3411-B gauge in accord with the instructions provided in the Troxler Type 3880 Leak Test Kit. A copy of the Certification of this Leak Test Analysis is enclosed.

We have hereby completed all the necessary steps that were required to correct the violations. All necessary documents will remain posted in place of storage, office and all other required locations. All wipe tests of the sealed source will be performed and maintained in accordance with Condition 14 of License 45-19458-01 to avoid further violations.

Date full compliance achieved: August 2, 1982.

If you have any questions, please do not hesitate to call.

Very truly yours,



Edwin C. Beethoven

ECB/wb
Encl.

Radionuclide: Cs 137 Am 241 Bc
Source Serial: CC 472 CAA 3176
Inst. Model: 3411-B
Inst. Serial: 7491
Date of Wipe: 8/2/82
Individual's Name: E. Bretherton
Telephone: (703) 532-1066

PLEASE TYPE OR PRINT LEGIBLY -
THIS IS YOUR RETURN ADDRESS LABEL

- ECB Engineers, Inc.
- 803 W. Broad St.
- Falls Church, Va.
- 22046

Troxler Electronic Laboratories, Inc., P.O. Box 12057, Research Triangle Park, N.C. 27709 919/549-8661 Telex 579474

Leak Test Analysis

Removable Activity	
Beta Gamma	Alpha
<u>0</u> μ Ci	<u>0</u> μ Ci
<u>Jeresa Snell</u> Certification	
Date: <u>8-12-82</u>	

NOTES

1. Follow procedures as defined in your leak test kit instructions.
2. Fill out this form and the bag label with required information where applicable. Seal the filter paper in the plastic bag. Place the plastic bag and this form in the pre-addressed envelope.
3. Removable activity will be reported in μ Ci. A value of "0" indicates less than .00005 μ Ci.
4. Federal and state regulations require that sealed sources be removed from service and reports filed if removable activity is greater than .005 μ Ci.
5. Due to the potential hazard, Troxler recommends that an additional wipe be made if removable activity exceeds .0005 μ Ci.
6. You will be notified by telephone collect if the test yields greater than .001 μ Ci removable activity.

ORIGINAL