TGG: The Geotechnical Group Inc.

March 2, 1994

U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attn: Document Control Desk

RE:

Reply to a Notice of Violation Docket No. 030-30425 License No. 20-28157-01

Gentlemen:

Enclosed is our written reply to the Commission's Notice of Violation based on the routine safety inspection conducted by Mr. Richard W. McKinley on February 8th, 1994 at the offices of The Geotechnical Group. Inc. Based on results of this inspection TGG was found to be in violation with Condition 13.A and Condition 15 of License No. 20-28157-01. The reason for the violations maybe linked to the fact that Civiltest Laboratories. Inc., the original license holder and one time subsidiary of TGG, was dissolved with TGG absorbing the equipment and services of the laboratory. During the transition a new Laboratory Director, Steven M. Mammone and Radiation Safety Officer, Wayne A. McArdle were placed in charge of the nuclear density gauge operations and maintenance. Listed below are our reply to each violation.

- A. In reply to the violation of Condition 13.A, TGG effective immediately has created a section on our current maintenance log charts to include leak testing to be conducted at six month intervals. Also, dates of leak tests to be performed are marked clearly on the laboratory calendar. Enclosed are the most recent results of our leak tests. These results will be kept on file for the required period of time as specified by the NRC. These corrective steps should prevent lapses in future testing periods.
- B. In reply to the violation of Condition 15, TGG effective immediately has begun to conduct a physical inventory of gauges to account for the sources and/or devices received and possessed under the license. The inventory will take place during the routine maintenance and leak test procedures. Records of our inventory will be kept on file for the required period of time specified by the NRC. It should be important to note that TGG has had a total of only two nuclear density gauges in it's inventory for the past five years and we do not expect this total to change in the near future. Records of inventory were not kept in the past due to such a small and unchanging total amount of gauges.

We hope that our reply has been adequate and that our corrective steps are acceptable to the Nuclear Regulatory Commission. If you have any questions or require additional clarifications, please feel free to call us anytime.

Very truly yours,

THE GEOTECHNICAL GROUP, INC.

Steven M. Mammone Laboratory Director

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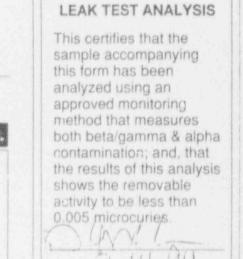
 Device - Model # 3440
 , Serial # 17776

 Source(s) - Serial # 4713215
 , Serial # 56-7274

 Date of Test: 2-8-94

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- . THE GEOTECHNICAL GROUP INC.
- · 100 CRESCENT ROAD
- NEEDHAH, MA 02194
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- Your Name: STEVEN MAHHONE Telephone: (617) 449-6450



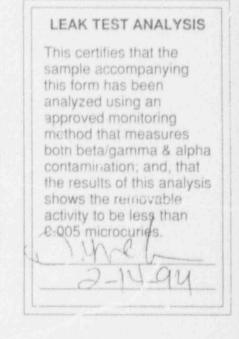


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Device - Model # 3440 , Serial # 17776 Source(s) - Serial # 47132.15 , Serial # 50-7274 Date of Test: 9-29-93

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- . THE GEOTECHNICAL GROUP INC.
- . 100 CRESCENT Rd.
- · NeedHAM, MA 02194

Your Name: STEVE MAMMONE Telephone: (47) 3455 449-6450

LEAK TEST ANALYSIS

This certifies that the sample accompanying this form has been analyzed using an approved monitoring method that measures both beta/gamma & alpha contamination; and, that the results of this analysis shows the removable activity to be less than 0.005 microcuries.

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Pi	 THE GEOTECHNICAL GROUP, INC. TOO CRESCENT Rd. MEDHAM, MA 02194
192	Your Name: S. MAMMONTE

Telephone: (617) 449-6450

This certifies that the sample accompanying this form has been analyzed using an

LEAK TEST ANALYSIS

approved monitoring method that measures both beta/gamma & alpha contamination; and, that the results of this analysis shows the removable activity to be less than 0-005 microcuries.