



The
Geotechnical
Group Inc.

CONSULTING GEOTECHNICAL ENGINEERS

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

SMM/sm
attachments

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940310001B 940302
PDR ADOCK 03030425
PDR

100 CRESCENT ROAD, NEEDHAM, MA 02194

Telephone 617-449-6450

FAX 617-449-1283

JEV 11



3008 Cornwallis Rd. P.O. Box 12057 Research Triangle Park,
North Carolina 27709, U.S.A.

Device - Model # 3440 , Serial # 17776

Source(s) - Serial # 4713215 , Serial # 50-7274

Date of Test: 2-8-94

Please print legibly and firmly. This is your return address label.

- THE GEOTECHNICAL GROUP, INC.
- 100 CRESCENT ROAD
- NEEDHAM, MA 02194
-

Your Name: STEVEN MAHMONI
Telephone: (617) 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.

[Signature]
2-14-94



3008 Cornwallis Rd. P.O. Box 12057 Research Triangle Park,
North Carolina 27709, U.S.A.

Device - Model # 3440 , Serial # 15667

Source(s) - Serial # 4711063 , Serial # 50-4750

Date of Test: 2-8-94

Please print legibly and firmly. This is your return address label.

- THE GEOTECHNICAL GROUP, INC.
- 100 CRESCENT ROAD
- NEEDHAM, MA 02194
-

Your Name: STEVE MAHMONI
Telephone: (617) 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.

[Signature]
2-14-94



3008 Cornwallis Rd P.O. Box 12057 Research Triangle Park, North Carolina 27709, U.S.A.

Device - Model # 3440 , Serial # 17776
Source(s) - Serial # 4713215 , Serial # 50-7274
Date of Test: 9-29-93

Please print legibly and firmly. This is your return address label.

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

Your Name: STEVE MAMMONE
Telephone: (617) ~~388-2200~~ 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.

[Signature]
10-4-93



3008 Cornwallis Rd P.O. Box 12057 Research Triangle Park, North Carolina 27709, U.S.A.

Device - Model # 3440 , Serial # 15667
Source(s) - Serial # 4711063 , Serial # 50-11-5
Date of Test: 9-29-93

Please print legibly and firmly. This is your return address label.

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

Your Name: S. MAMMONE
Telephone: (617) 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.

[Signature]
10-4-93