

March 28, 1994

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



RE: **Reply to a Notice of Violation**  
Docket No. 030-30227  
License No. 20-28103-01

Dear Sirs:

This letter is in response to the NRC letter dated February 22, 1994, regarding a Notice of Violation for License Number 20-28103-01.

### **VIOLATION A**

Prior to February 1993, there were some gaps in the 6-month leak test requirement for our Troxler units. However, our records do not show the time gap (August 1991 - February 1993) listed as Violation A on the Notice of Violation.

Our records show that three out of the seven units (Units 4, 6, and 7) do not have any violations of the leak test requirement. Our records show the following gaps in leak testing: Unit 1, 12-month gap (November 1992 - September 1993); Unit 2, 18-month (November 1990 - February 1992) and 12-month (September 1992 - September 1993) gaps; Unit 3, 12-month gap (November 1990 - August 1991); and Unit 5, two 18-month gaps (November 1990 - January 1992) and (January 1992 - September 1993).

1. This violation occurred due to a lack of administrative control and checks on the testing schedule and the personnel responsible for conducting the tests.
2. Since January 1993, tighter administrative controls have been implemented including the development of a summary form for Leak Test Records. The form lists the most current leak test date for each of the Troxler units and indicates when the unit is due for the next leak test. This form has been distributed to the personnel responsible for conducting the tests. Since the development and use of this form in 1993, leak tests have been conducted on a regular 6-month schedule.
3. In addition to the steps discussed in Item 2 above, routine inspections of all records will be conducted by the Radiation Safety Officer (RSO).
4. As of this date full compliance is achieved.

Copyright© 1994 GZA GeoEnvironmental, Inc.

9404110001 940328  
PDR ADOCK 03030227  
C PDR

IE07  
1/0

320 Needham Street  
Newton Upper Falls  
Massachusetts 02164  
617-969-0050  
FAX 617-963-7769

A Subsidiary of GZA  
GeoEnvironmental  
Technologies, Inc.



**VIOLATION B**

While the actual sources have not been inventoried on a regular schedule, physical inventory of the units is conducted as part of our routine sign-out and leak test procedures. However, this information was not recorded on a specific form for inventories.

1. This violation occurred due to a lack of administrative control and RSO oversight.
2. A new inventory form has been developed for documentation of the 6-month inventory of the sealed sources. The sources and the units will be inventoried when the units are leak tested and the results will be documented on one central form.
3. Strict adherence to the procedures detailed in Item 2 above and routine inspections of all records by the RSO will prevent further violations.
4. The procedures discussed above will be implemented immediately and compliance is expected to occur over the next 6 months.

We trust this information meets your needs. If there are any questions, please contact the undersigned at (617) 969-0050.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

*Mary Strzempko*  
Mary Strzempko  
Radiation Safety Officer

*William R. Beloff*  
William R. Beloff, P.E.  
Regional Manager

MS/WRB:idm

cc: NRC Regional Administrator, Region I  
Stephen Venuti, Corporate Health and Safety Director