

030-22181

**I INDEPENDENT MATERIALS TESTING**  
 57 N. WASHINGTON STREET  
 P.O. BOX 745  
**LABORATORIES, INC.**  
 PLAINVILLE, CONNECTICUT 06062 (203) 525-7193 FAX (203) 747-6455

*NVLAP Accredited for Construction Testing Services*

December 22, 1993

"Reply to a Notice of Violation"

Mr. Walter J. Pasciak, Chief  
 Industrial Applications Section  
 Division of Radiation Safety and Safe Guards  
 United States Nuclear Regulatory Commission Region I  
 475 Allendale Road  
 King of Prussia, PA 19406-1415

RE: Routine Inspection No. C30-22181/93-001  
 Docket No. 030-22181  
 License No. 06-20980-01

Gentlemen:

The following is my response to the notice of violation dated 12/8/93, as a result of a routine inspection on 11/15/93.

A) Contrary to our license condition 10, our nuclear densometers were moved from our former location to 57 North Washington Street, Plainville, CT. The NRC was formally notified, only prior to the routine inspection, and before that informal notification was sent via a change of address card. However, we were aware of the need to notify the NRC within a timely manner, but we were unclear of move-in dates, densometer move date, and the issue of notification, prior to the move.

On 12/20/93, I received word from the NRC that the change of address and storage plan were being reviewed and processed. We do not plan any future moves; however, it is very clear that should we move densometers to any other permanent storage location that we notify the NRC in advance.

B) During the past several years, we have kept reasonably good records and have retained all but a few of the leak test periods, which either was not in service or not done. The records were all filed in the accordian folders that Mr. McKinley reviewed, but they were not found in the correct compartments. Leak tests are currently up to date. Please see the enclosed leak test historical log showing all of the leak tests that we have and the not in service periods and due dates.

9404260057 940411  
 PDR ADOCK 03022181  
 C PDR

*Test reports may not be reproduced except in full with approval of IMTL. All results relate only to the items tested.*

TESTING	RESEARCH	ANALYSIS	INSPECTION	CONSULTING
Portland Cement Concrete	Soils	Steel	Building Products	Bituminous Concrete

JAN 05 1994

# INDEPENDENT TESTING

Mr. Walter J. Pasciak, Chief  
Routine Inspection  
Page Two

During each leak test, we have posted on our densometer storage room door a notice of the next leak test due. This system will serve us well as a reminder.

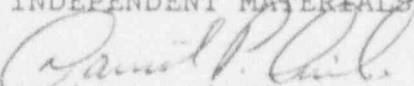
- C) A physical inventory had not been recorded for our densometers as required by our license. This was because during the previous routine inspection we had only three densometers and we did not have the need, since we knew where each instrument was at all times. Since that time, we have a daily log that is used to keep track of the instruments. We thought that we were well within the intent of this requirement. Recently, in addition, we are strictly following this license provision to record the inventory every 6 months at the time of our leak test date. The same log, as noted and enclosed as part of the item (B), has the recordation of the inventory, and the posted leak test notice due date is also marked with the inventory due date.

This should also provide us with a practical method to review and record the physical inventory at one location at the required frequency.

We realize that complying with the license and its provisions are key to complying with the NRC regulations. We also realize that obtaining and holding a license is a privilege. We will continue to do everything possible to maintain your confidence.

Very truly yours,

INDEPENDENT MATERIALS TESTING LABORATORIES, INC.

  
David P. Aiudi  
Director of Testing, RSO

DPA/vb

cc: NRC Document Control Desk  
Washington, DC