

Alt & Witzig Engineering, Inc.



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September 27, 1990

United States Nuclear
Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, IL 60137
ATTN: Mr. A. Bert Davis

RE: License No.: 13-18685-01
Docket No.: 030-14041

Gentlemen:

This letter is submitted as a response to the Confirmatory Action Letter dated September 4, 1990.

At the time of this letter we have yet to receive a summary of the August 29 meeting. Thus, it is somewhat unclear as to your interpretation of discussions presented both by us and by your staff representatives on that date. We have had indepth discussions among our administrative people regarding the various statements which were presented by your staff at our meetings and during telephone conversations. We have, however, attempted to get an "accurate reading" of what actual changes you are requesting to be implemented within our radiation safety program.

As requested, we are enclosing with this response an amendment to our NRC license. As one of the items within this amendment, we have designated Dr. Swapan Ghosh as the new RSO for our company. Enclosed is a check for \$300.00 for the Amendment Fee.

As per your request we are also submitting comments describing our basis for confidence in the RSO position of our company. As was stated several times during our most recent meeting, the newly implemented audit systems provide the basis for assurance that our radiation safety program is in compliance with regulations.

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CONSTRUCTION MATERIALS TESTING AND INSPECTION
ENVIRONMENTAL SERVICES

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The following are additional comments specifically related to the RSO position which justify our basis for confidence in the RSO position itself.

The new RSO position is within our administrative department (outside the Testing Division of our company). Thus the RSO is not involved in any way with the management, day-to-day production, or scheduling aspects of either the users or the gauges.

Dr. Ghosh, the designated RSO, is a highly trained environmental engineer. An extensive portion of Dr. Ghosh's background includes interpreting and implementing detailed regulations. We have confidence that this background will be beneficial in his handling and developing the position of RSO. Enclosed is a copy of Dr. Ghosh's resume.

The RSO will be charged with the responsibility of implementing the designated audit functions. He will maintain complete records and documentation of all radiation safety operations.

The RSO will report directly to the president of the company on a regular basis. An audit and evaluation of this position will be performed by myself on a bi-annual basis.

In order to upgrade his qualifications, Dr. Ghosh is scheduled to complete a radiation safety course presented by Troxler. This course is entitled Troxler Nuclear Gauge Safety Training Program. This safety training course will be taken on October 9, 1990, in Indianapolis, Indiana.

You have requested that a procedure be set up to ensure that possession limits are not exceeded. The enclosed Amendment to License Item 6 references Requisition of new gauges. This Requisition Form will indicate the possession limits of the License and designate the sequential gauge number being purchased by our company to ensure that source limits are not exceeded.

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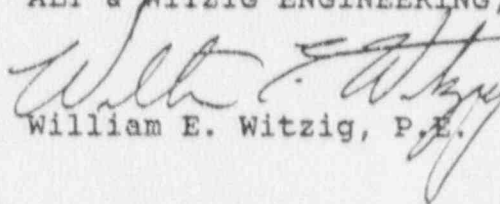
You have also requested a procedure to ensure that unqualified individuals are not operating density gauges. As part of our audit system (Item 5 of Amendment), the RSO will generate a current list of qualified users. This list will be posted in the gauge room and issued to all testing managers. All managers will be informed that at no time will an unauthorized user be assigned to operate a gauge.

We would again reiterate that our interpretations of all discussions, meetings, and the Confirmatory Action Letter indicate your main concern to be that Alt & Witzig implement an internal audit system outside the control of management. We are convinced that changes in our radiation safety program have been established to implement this control.

If you have any further questions, please contact us at your convenience.

Very truly yours,

ALT & WITZIG ENGINEERING, INC.



William E. Witzig, P.E.

WEW:smg

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