

January 4, 1991

Director Office of Enforcement U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

Subject: Reply to a Notice of Violation Docket No. 030-08916 License No. 45-15325-01 EA 90-183

To Whom It May Concern:

This letter is in response to the violations noted in your letter dated December 10, 1990.

Violation I

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> McCallum Testing Laboratories, Inc. admits to the violation of October 4, 1990, as presented in your letter of December 10, 1990. The incident occurred due to human error and a relaxed awareness of the importance of proper security for the units. The technician involved has been severely reprimanded. Immédiately following the incident, we again stressed to all authorized nuclear technicians the proper procedures for transporting and handling of nuclear units. A letter was given to each technician again outlining these procedures. Technicians were required to sign and return one copy, keeping one copy for their permanent records. A copy of each signed response is attached. We have also met both as a group and individually to discuss the handling of the units to prevent any further incidents. Individual job audits are being performed to insure compliance. We have also posted additional reminders for handling the units along with the proper emergency procedures to be followed with correct telephone numbers to report any incidents to the NRC in a timely manner. A copy of this memo is also attached. We have implemented your suggestions from our meeting of November 5, 1990, and feel we are now in conformance as of November 9, 1990.

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#### Violation II

McCallum Testing Laboratories, Inc. admits to the subject violation as presented in your letter of December 10, 1990. As of July 18, 1990, all but three technicians had been certified by Geophysical Training Consultants. These three technicians were trained "in-house" by the Radiation Protection Officer and were not available for the previous training session provided for our firm by Geophysical Training Consultants. We have had another training course and all technicians are now certified and in full compliance as of November 14, 1990. Copies of the three newly acquired training certificates are attached. In the future, all added nuclear technicians will be fully trained by the Radiation Protection Officer and an approved training consultant prior to their independent use of the licensed materials.

If you require additional information or have any questions, please advise.

Very truly yours,

McCALLUM TESTING LABORATORIES, INC.

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Philip S. Berman Radiation Protection Officer

City of Chesapeake State of Virginia

Acknowledged before me this 4th day of January, 1991.

Doris D. Hanks, Notary Public

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My commission expires My Commission Expires August 27, 1991

cc: Regional Administrator U.S. Nuclear Regulatory Commission Region II



TO ALL NUCLEAR PERSONNEL:

If an incident occurs with your unit and you are unable to contact Philip Berman, the Radiation Safety Officer or John Pritchard, President in a timely manner, the point of contact with NRC is listed below.

Region II #1-404-331-7438 Earl Wright Material Radiation Protection SC 101 Marietta Street, Suite 2900 Atlanta, GA 30303

MCCALLUM TESTING LABORATORIES, INC.

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Philip Berman Radiation Protection Officer

MCCALLUM TESTING LABORATORIES INC. Subsurface Exploration • Geotechnical Engineering

October 19, 1990

TO: All Nuclear Technicians

Subject: Memorandum of action taken for licensed material - Nuclear License 45-15325-01 October 16, 1990

Due to a recent incident which occurred on October 4, 1990, involving the theft of a vehicle and density gauge whereby the gauge transport was secured in the rear cargo area but was not locked or closed, the following criteria will be followed:

- When units are being transported the gauge will be in the safe position and the source rod locked. The case will be secured in the back of the vehicle and locked with a chain or cable.
- When the units are secured at the lab, the cases will be locked and the source rod in the safe position and locked and the units will be retained in a designated storage area which will be locked at all times.
- 3. When the units are not being used on the job site they will be secured as #1 above and under the constant control of the technician at all times.

These instructions are to be followed with no exceptions.

Please sign and return one copy of this letter which will be Kept in a permanent file.

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Philip S. Berman Director of Operations



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Mark D. Curry

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# Geophysical Training Consultants

**CERTIFY THAT** 

WILLIAM L. SIMERSON JR.

OF

MCCALLUM TESTING LABS. INC.

Has successfully completed the portable nuclear gauge training seminar for operators and is versed in radiation safety principles, practices and use of gauging devices.

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NO. 339

Instructor

11/14/90

Date

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ERNEST B. GARD

OF

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122 hola 15 sparly

NO. 338

Instructor

11/14/90

Date

NO. 340

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