

JOHN J. LAWRENCE & ASSOCIATES, INC.

CIVIL - SANITARY - DESIGN - TESTING - INSPECTION

485 PROSPECT AVE., HARTFORD, CONN. 06105

TELEPHONE (203) 232-4740



November 30, 1993

United States NRC, Region II
Attn: Walter Pasciak
475 Allendale Road
King of Prussia, PA 19406-1415

Docket No. 030-17162
License No. 06-19223-01

Dear Mr. Pasciak:

In response to the enclosed Notice of Violation - Appendix A, I feel that a physical inventory of the gauge has been maintained at our location.

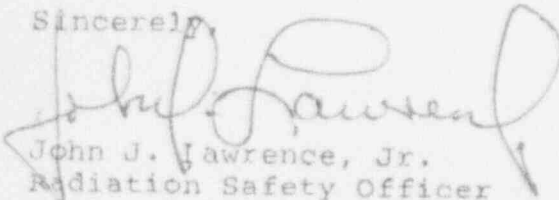
The gauge has not been used since 1990, but we have maintained the badges with Siemens on a three-month interval.

The gauge is in an area that its physical presence is observed daily if not weekly. The records have been maintained both in our Office Manager's file cabinet under the heading "Nuclear Regulatory Commission" and a file in a desk used by a certified technician labeled "Leak Test Results".

In order to ensure that a physical inventory is recorded on hard copy every six (6) months, a form will be attached to a clipboard near the gauge and the entrance to the testing laboratory and will be checked and initialed every six (6) months.

This letter and the form for conducting the physical inventory will be reviewed by all employees. The form will be posted no later than December 15, 1993.

Sincerely,


John J. Lawrence, Jr.
Radiation Safety Officer

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PDR ADOCK 03017162
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APPENDIX A

NOTICE OF VIOLATION

John J. Lawrence, Jr.
Hartford, Connecticut 06105

Docket No. 030-17162
License No. 06-19223-01

During an NRC inspection conducted on November 2 and 9, 1993, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Condition 15 of License No. 06-19223-01 requires that the licensee conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.

Contrary to the above, the licensee did not conduct a physical inventory of their Troxler gauge containing 10 millicuries of cesium-137 and 50 millicuries of americium-241 between March 12, 1990 and November 2, 1993, an interval in excess of six months.

This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, John J. Lawrence, Jr. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.