



GTG-FOX

Geotechnical Services,
LTD.

May 17, 1994

SOILS & FOUNDATION ENGINEERS
CONSTRUCTION MATERIALS TESTING LABORATORY

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

Subject: Reply to Notice of Violation, Docket: 030-12693, License: 05-17401-1

Gentlemen:

In response to your notice of violation dated April 19, 1994, we are submitting the following explanation of the reason for the violation, the corrective steps taken, and the program in-place to prevent further violations of this type.

This violation occurred as the result of inaccurate record keeping on the part of my predecessor in the position of Radiation Safety Officer. In March of 1993, I assumed the position of Radiation Safety Officer. At that point in time, I began to organize the records so that accurate tracking of each gauge's maintenance, leak testing and usage was accomplished. This included inventories performed every six (6) months as required by our license. It was during the October 1993 inventory that I discovered Troxler gauge number T3418255 was not on the inventory and had not been leak tested with the other gauges during that round of testing. I immediately placed that gauge on our inventory and performed the wipe test which I sent off for leak testing. The results of that test and the subsequent test have been nil.

To prevent a repeat of this occurrence, wipe testing for the leak test and gauge inventory are performed concurrently to ensure that all gauges in inventory are tested. This is performed at a maximum time interval of six (6) months between tests. Additionally, any transfers of gauges are noted in the inventory at the time of transfer so that the inventory is accurate at all times.

We achieved compliance on November 15, 1993.

Should you have any questions regarding this or other matters, please call.

Very truly yours,

GTG-FOX GEOTECHNICAL SERVICES, LTD.

James C. Blankenship, P.G.
Radiation Safety Officer

JCB/mjm/DCN D0316.94

cc: Regional Administrator

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