

TO: U.S. NUCLEAR REGULATORY COMMISSION  
REGIONAL ADMINISTRATOR  
REGION II  
101 MARIETTA STREET, N.W.  
SUITE 2900  
ATLANTA, GEORGIA, 30323-0199

MAY 20, 1994

FR: ALPINE TECHNOLOGIES  
P.O. BOX 700  
RTE. 1 BOX 154-B00  
BRUCETON MILLS, W.VA. 26525

RE: REPLY TO NOTICE OF VIOLATION  
(NRC INSP. REPORT NO. 47-23065-01/94-01)  
DOCKET NO. 030-20231  
LICENSE NO. 47-23065-01

GENTLEMEN:

THIS LETTER IS IN REPLY TO THE NOTICE OF VIOLATION ALPINE RECEIVED AFTER THE INSPECTION PERFORMED ON APRIL 26, 1994 BY MR. L. FRANKLIN. THREE VIOLATIONS OF THE NRC REQUIREMENTS WERE IDENTIFIED DURING THIS INSPECTION. NONE OF THE VIOLATIONS ARE BEING CONTESTED. THE FOLLOWING IS AN EXPLANATION FOR EACH VIOLATION AND CORRECTIVE STEPS TAKEN TO ASSURE BOTH IMMEDIATE AND FUTURE COMPLIANCE TO THE REGULATIONS:

- A. LICENSE CONDITION 1 AND 10: AT THE BEGINNING OF THE YEAR, (1994), I PURCHASED ADJACENT PROPERTY NEXT TO MY PERSONAL RESIDENCE WHICH I HAD BEEN BUILDING AND FINALLY MOVED INTO IN 1993. THE OFFICE AND LAB AT 572 DUNKARD AVE., WESTOVER, W.VA. (15 MILES AWAY) WAS GIVEN UP AND MOVED TO EXISTING BUILDINGS LOCATED ON THE ABOVE MENTIONED ADJACENT PROPERTY. DURING THIS MOVE AND THE TIME PRECEDING JANUARY 27, 1994, WHEN A COMMISSION REPRESENTATIVE CONTACTED ME AND INFORMED ME HE HAD TRIED TO PERFORM AN INSPECTION, I MUST HONESTLY SAY THAT I HAD NOT THOUGHT TO INFORM THE NRC OF MY MOVE IN LOCATION. AT THE TIME, I WAS IMMEDIATELY CONCERNED AND INVOLVED WITH TRYING TO GET ALL THE LAB EQUIPMENT IN PLACE AND WORKING PROPERLY. I REALIZE THAT THIS DOES NOT JUSTIFY MY FAILURE IN NOT NOTIFYING THE NRC OF A LOCATION CHANGE.

THE CORRECTIVE STEPS TAKEN TO REMEDY THIS SITUATION WAS TO AMEND MY LICENSE TO INCLUDE THE CURRENT ADDRESS. AS FOR STEPS TAKEN TO INSURE THIS NOT HAPPENING AGAIN, I CAN ASSURE YOU THAT THIS EXPERIENCE HAS MADE A LASTING IMPRESSION CONCERNING MY RESPONSIBILITIES IF I EVER MOVE AGAIN.

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- B. LICENSE CONDITION 12: IT WAS FOUND THAT SOME OF THE LEAK TESTS FOR THE MOISTURE DENSITY GAUGES WAS NOT PERFORMED AT THE CORRECT INTERVALS. ALTHOUGH GAUGES ARE ASSIGNED TO TECHNICIANS AND ARE THEIR RESPONSIBILITY DURING THOSE TIMES, IT IS MY ULTIMATE RESPONSIBILITY TO ASSURE THAT ALL TESTS AND REQUIREMENTS CONCERNING THE GAUGES ARE MET AND COMPLIED WITH. I GIVE NO JUSTIFICATION FOR THE FAILURE OF THESE TESTS BEING PROPERLY PERFORMED.

THE CORRECTIVE STEPS TAKEN TO REMEDY THIS WAS TO CHECK AND MAKE SURE THAT ALL GAUGES ARE CURRENTLY IN COMPLIANCE. IT WAS DETERMINED THAT ALL GAUGES ARE AT THIS TIME PROPERLY LEAK TESTED AND IN COMPLIANCE WITH THE REGULATIONS. IN TERMS OF MAKING SURE FUTURE TESTS WILL BE PERFORMED ON TIME, I HAVE MARKED EACH METER WITH THE DATE WHEN THE REQUIRED LEAK TEST FOR THAT PARTICULAR METER IS DUE AND GIVEN EXPLICIT INSTRUCTIONS TO BRING THE METER INTO THE LAB TO BE LEAK TESTED ON OR BEFORE THIS DATE. I HAVE ALSO POSTED THE LEAK TEST SCHEDULE FOR ALL GAUGES ON THE DOOR WHERE THEY ARE STORED AND ON THE COVER OF THE GAUGE PACKETS EACH TECHNICIAN CARRIES WHILE THE GAUGE IS IN HIS POSSESSION.

- C. LICENSE CONDITION 16: IT WAS FOUND THAT DOCUMENTATION OF A 6 MONTH PHYSICAL INVENTORY WAS NOT IN ORDER. THIS WAS DUE TO THE FACT THAT THE LEAK TEST REPORTS WERE TO SERVE AS EVIDENCE OF COMPLIANCE. THIS IS NOT TO SAY, HOWEVER, THAT THE GAUGES ARE EVER NOT ACCOUNTED FOR. I PERSONALLY KNOW ON A DAILY BASIS WHERE EACH GAUGE IS AND WHO IS USING IT. I ALSO REQUIRE THAT ALL GAUGES BE STORED IN THE LAB AT THE END OF EACH WORKING DAY AND PICKED UP AGAIN THERE AT THE BEGINNING OF THE NEXT DAY IT IS TO BE PUT INTO SERVICE.

THE CORRECTIVE STEPS TAKEN TO REMEDY THIS SITUATION IS TO ASSURE THE CONDITIONS IN B.(ABOVE) ARE CARRIED OUT AS THEY HAVE BEEN STATED.

IF YOU HAVE ANY FURTHER QUESTIONS OR NEED ANY FURTHER RESPONSE CONCERNING THESE VIOLATIONS, PLEASE CONTACT ME.

SINCERELY,

STEVE B. HARMAN

C.C. DOCUMENT CONTROL DESK