a McDermott company

P.O. Box 239 Lynchburg, Virginia 24505 (804) 384-5111

November 4, 1982

0

£50

Mr. A. F. Gibson, Chief
Technical Inspection Branch
Division of Engineering
and Technical Programs
U.S. Nuclear Regulatory Commission
101 Marietta Street, N.W., Suite 3100
Atlanta, GA 30303

Reference: 70-824/82-07

Dear Mr. Gibson:

This is in response to Appendix A, Notice of Violation, forwarded with the reference. My responses under the provisions of 10 CFR 2.201 are attached.

The attached information is of a type specified in 10 CFR 2.790(d) and should be subject to disclosure only in accordance with the provisions of 10 CFR 9.12.

Very truly yours,

Wengelder

T. C. Engelder, Director
Lynchburg Research Center

TCE:jgb Attachment

ATTACHMENT

1. Admission or denial of the alleged violation.

I admit that the records of measurements of samples and standards made, utilizing the segmented gamma scan system, were not maintained in accordance with the requirements in 10 CFR 70.57(b)(12).

2. The reasons for the violation.

The violation occurred because the segmented gamma scan operator was not adequately instructed in the data maintenance requirements and the procedure for the use of the gamma scan system did not adequately address the need for data retention and the ability to dily relate the sample data to the standard calibration data.

3. The corrective steps taken and results achieved.

To correct this situation, the segmented gamma scan operator has been instructed in the need for data recording and retention. The gamma scan system has been modified to print the data of each measurement of sample and standard, thus making the two readily relatable.

4. The corrective steps to be taken to avoid further violations.

The procedure for waste container scanning will be revised to include the requirements for data retention and that the data of standard calibration be readily relatable to sample data.

The date when full compliance will be achieved.

Full compliance will be achieved upon completion of the revision to the procedure for waste container scanning which is scheduled for December 15, 1982.