

SEP 15 1994

Docket No. 9999-0001

New Hampshire License No. 316R

GZA GeoEnvironmental, Inc.  
ATTN: Mark D. Bucknam, P.E.  
380 Harvey Road  
Manchester, New Hampshire 03103-3347

Dear Mr. Bucknam:

SUBJECT: Notice of Violation

This refers to an inspection conducted by the New Hampshire Bureau of Radiological Health on August 16, 1994, in which it was identified that GZA GeoEnvironmental, Inc. (GZA) performed work in Rutland, Vermont. This work requires the filing of NRC Form-241 and the receipt of authorization from the NRC Regional Administrator prior to commencement of the activities in accordance with section 150.20 of 10 CFR Part 150.

It is our understanding that the activities in question were performed out of your office and following the procedures of your New Hampshire radioactive materials license. GZA maintains a number of NRC licenses to perform these activities. As such, the work could have been performed under one of GZA's NRC licenses provided the procedures and commitments of the NRC license were followed and provided that the work was performed under the supervision of the NRC license's Radiation Safety Officer. In responding to the enclosed Notice of Violation, please specify how you shall handle performing work in non-Agreement States in the future. Specifically, state whether such work will be performed after the filing of NRC Form-241 and receiving authorization or whether it will be performed under one of GZA's NRC licenses.

Based on the findings mentioned above, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed as Appendix A and categorizes each violation by severity level in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy). You are required to respond to this letter and in preparing your response, you should follow the instructions in Appendix A.

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Please use the enclosed self-addressed green envelope when you submit your copy to the Regional Administrator, Region I, this will assist us in the timely processing of your response. In accordance with Section 2.790 of NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room. The responses directed by this letter and the accompanying Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Your cooperation with us is appreciated.

Sincerely,

**Original Signed By:**  
**Walter J. Pasciak**

Walter J. Pasciak, Chief  
Industrial Applications Section  
Division of Radiation Safety  
and Safeguards

Enclosure: Appendix A, Notice of Violation

cc with enclosure:  
Public Document Room (PDR)  
Nuclear Safety Information Center (NISC)  
State of New Hampshire

bcc:  
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