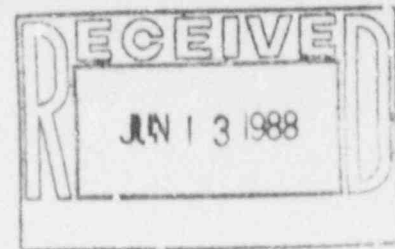




ENGINEERING, INC.
Sanderson/Stewart/Gaston



June 6, 1988

Nuclear Regulator Commission
Region IV
611 Ryan Plaza Drive
Suite 100
Arlington, Texas 76011

Attention: William Fisher, Chief

Re: NRC Inspection

Dear Mr. Fischer:

Enclosed please find our response to a recent routine, unannounced radiation safety inspection conducted by Mr. L.T. Ricketson and Mr. A.D. Gaines from your office on April 21, 1988 regarding the activities authorized by NRC By-Product Material License 25-19303-01.

I have addressed each item as they appear in your letter dated May 16, 1988 and received in our office May 18, 1988. As you will notice in reviewing my response, we have requested an amendment to our current license adding our field office at Bozeman, Montana and Sheridan, Wyoming as permanent storage areas. We have not received any reply to our recent request and are unsure as to the schedule required to obtain an amendment. This item is the only one not fully in effect to date.

ITEM #1 - 10 CFR 30.34

Response: During the winter months and during periods of no construction, all Troxlers are stored at the Billings, Montana site (1001 South 24th Street West). However, during periods of construction, these units are used throughout Montana and Wyoming. Until recently, we considered our Bozeman and Sheridan, Wyoming offices temporary job sites in the event a Troxler was needed at any one of these sites. We have requested an amendment to our license requesting that the Bozeman and Sheridan offices be classified as permanent storage facilities. License amendment requested May 1988, response from NRC should be forthcoming. We are scheduling this program into effect by July 1, 1988.

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REG4 LIC30
25-19303-01 DCD

Consulting Engineers and Land Surveyors

Billings, Montana
Suite 200 Creekside
1001 South 24th Street West
59102-3091

Sheridan, Wyoming
Suite 301
45 East Loucks
82801

Bozeman, Montana
2010 North 7th Ave.
P.O. Box 861
59715-0861

IC-88/653

IC-07
1/9

ITEM #2 - 10 CFR 19.11

Response: Copies of form NRC-3 have been posted at all three places of business (Billings, Bozeman, and Sheridan, Wyoming). Copies of Part 19, Part 20, the license, license condition, documents incorporated into the license, license amendments and operating procedures are referenced at each office as being available and on file at the Billings office. This program is in effect as of May 20, 1988.

ITEM #3 - 10 CFR 20.401

Response: During extended periods when the Troxlers are not in use but stored, it is our understanding that radiation exposure records need not be recorded. We have, however, required all operators to possess a radiation film badge at all times while operating this equipment. Some problem has been encountered because of our service agent who furnished badges is no longer going to provide this service. We are in the process of getting all available radiation data from this agent for our files. We have subscribed with Landauer and Company and will be keeping these records for your review in the future. New film badges are on order and data from old service agent requested. Program in effect as of May 20, 1988.

ITEM #4 - 10 CFR 30.51(a)

Response: We have started a record on each Troxler unit showing the receipt, transfer, and disposal of licensed materials. These records will be kept up to date and available for your future inspection. This program is now in affect as of May 20, 1988.

ITEM #5 - License Condition 13

Response: Due to long periods of inactivity in using our Troxlers, we have inadvertently overlooked periodic leak tests. We have instituted a program of performing leak tests every six (6) months. These tests have been performed recently and the results will be are on file for your review. This program is now in affect as of May 20, 1988.

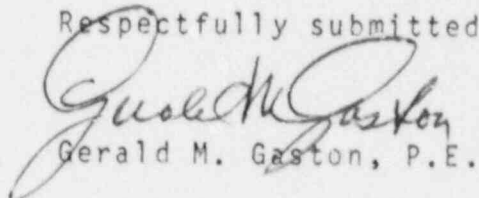
ITEM #6 - Licene Condition 16

Response: Transportation of our equipment has always been in company owned vehicles. We have never shipped any Troxler by common carrier. Nevertheless, when in transport we will have shipping papers attached to each unit along with a log showing the location of each unit. This program is in effect as of May 20, 1988.

Nuclear Regulator Commission
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This concludes my response to the above referenced items. Should you need additional information, feel free to contact our office.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Gerald M. Gaston".

Gerald M. Gaston, P.E.