



PROFESSIONAL CONSULTANTS INCORPORATED

3115 RUSSELL ST.
P.O. BOX 3416
MISSOULA, MONTANA
406/728-1880 59806

October 27, 1986

Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Notice of Violation and Proposed Imposition
of Civil Penalties
Docket No. 30-14597
License No. 25-18172-01
EA 86-140

STATEMENT AND EXPLANATION

Professional Consultants, Incorporated would like to make the following statements in response to the Notice of Violation referred to above.

- A. True, our office was moved in June 1985 from 620 High Park Way to 3115 Russell in Missoula, a distance of about 6 blocks. The oversight was one of pure negligence on the part of the R.P.O. to remember to apply for an Amendment to the license. An Amendment was applied for on July 29, 1986. The R.P.O. has been instructed to review the license semi-annually for conditions or terms that are not being met and to correct them immediately.

Full compliance will be made upon receipt of an Amended license. (Received October 24, 1986)

- B. True, the users of the gauge had completed and were certified by a course given by Nuclear Testing Services (43-17936-01). Our license specifies a Troxler training course. While this is a violation, our R.P.O. did not realize the significance of a specified training service. N.T.S. is certified and is virtually the only course reasonably available to licensees in our area. All local users to our knowledge have been trained by N.T.S.

Our license renewal application of July 1, 1983, was submitted with the N.T.S. training specified for the R.P.O. and no comment was received from the N.R.C. at that time as to insufficient training.

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An Amendment to the license was applied for on July 29, 1986, to allow use of any N.R.C. approved training course. If this Amendment is granted, we will no longer be in violation, and further violations of this condition will be eliminated.

Full compliance will be made upon receipt of an Amended License. (Received October 24, 1986)

- C. True, a written inventory of the one sealed source in our possession was not made, the R.P.O. was negligent in not realizing a written report was necessary even if the source was in our possession or on a documented shipment for calibration/repairs.

A written inventory will be made and kept every 6 months on June 30 and December 30 each year. This duty, along with the license review and leak test will be part of the R.P.O.'s specified responsibilities. Full compliance will be immediate.

- D. True, although we have had a continuous contract with R.S. Landauer for the monthly testing of film badges, the records from March 1981 to April 1985 were not current., In April 1985, the R.P.O. realized this was not being kept up and instructed the secretary to keep track of the film and reports. This has been done since.

Any further lapse in the reports will be noted and corrected by the R.P.O. in his semi-annual review. Full compliance was achieved in April, 1985.

- E. True, the document board in place at 620 High Park Way, was not transferred to our present office through negligence. A new board has been prepared and posted with the required information. Updated or additional documents will be included with the R.P.O.'s semi-annual review.

Full compliance was achieved in August, 1986.

- F. Partially true. A leak test dated 2-4-85 was in the file but over looked by the inspectors. A copy of that test has been supplied to the N.R.C. The requirement for a test every six months was overlooked by our R.P.O. That test will be part of his semi-annual review and reporting. A leak test was made 7-3-86 and results supplied to the N.R.C. Full compliance was achieved on this date.

- G. 1, 2 and 3.
True, our R.P.O. did not understand that these regulations applied to transport to and from the construction site by private carrier. We do have a certified and proper container on the premises that was used if shipping by

common carrier. The R.P.O. was negligent in not understanding the complex and extensive regulations apparently governing shipping by private carrier.

The instrument is being transported in the proper container and will continue to be so. Tests results and safety analysis on the container and the special form material are being requested from the manufacturer.

Full compliance will be achieved by November 30, 1986.

ss *R. A. Ainsworth* 10-27-86
R. A. Ainsworth, President
PROFESSIONAL CONSULTANTS, INC. Date

STATE OF MONTANA

County of Missoula

On this _____ day of _____, 1986,
before me, a Notary Public for the State of Montana, personally
appeared R. A. AINSWORTH, known to me to be the President of
Professional Consultants, Incorporated whose name is subscribed in
the within instrument, and acknowledged to me that he executed
the same.

Notary Public for the State of Montana
Residing at Missoula, Montana
My Commission expires _____