

**ALASKA**  
**T E S T L A B**  
A Division of DOWL, Incorporated

June 30, 1989

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Reply to a Notice of Violation  
License No. 50-21252-01

Ladies and Gentlemen:

This letter is a response to a letter dated June 14, 1989 from Region V reporting the results of an on-site inspection of our facility. We appreciate the inspection we received. The NRC inspector was professional, thorough, helpful and courteous.

We are committed to handle the radioactive materials we have safely, and in full conformance to applicable law and regulation. We are very concerned about the violations reported, particularly considering some were repeat violations. However, the violations were not willful, and have been corrected, as described below.

Leak Test Interval Exceeded Six Months

The instrument had not been used for some two years. During that time it remained in a locked room adjacent to my office. This is why the leak test was inadvertently not performed. When the inspector brought this to our attention, we immediately had the leak tested performed. A copy of the leak test certificate is attached.

We are now using the instrument again which will make it easier to remember to have the leak test done. I have put the leak test on a prompt calendar at six month intervals.

Six Month Inventory Records

Again the instrument had been stored in a locked room for two years. It was adjacent to my office. I knew where the instrument was at all times. In the same room were other

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instruments used frequently, so if it had been gone it would have been noticed. This does not excuse our violation of our license provision. I point this out only to show the violation did not result in an unsafe condition.

We now have a log book that is kept with the instrument. Each time the instrument is moved for any reason that is logged into the book. We have calendared to make an entry in the log book each time the instrument is leak tested.

Caution, Radioactive Material Sign

The room where the instrument was stored was labeled as containing radioactive material. However, the label was a Department of Transportation class II, yellow label used for shipping the instrument. It did adequately notify that a radioactive instrument was stored in the room, but it did not strictly comply with our license.

This has been corrected. There is now a sign on the door of the room which states, "CAUTION, RADIOACTIVE MATERIAL".

Notice Posting

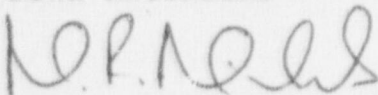
I simply overlooked this item. This has been fully corrected. The notice has been posted. It is encased in plastic, and screwed to the metal door of the storage room.

I hope this answers all of your questions. I feel badly these violations have occurred, and will make every effort to see they are not repeated. I look forward to having your inspector return. In fact it would be helpful if the inspections were carried out more frequently, particularly when we are so far away from an NRC office.

If you have further questions, please call.

Most sincerely,

DOWL ENGINEERS



Melvin R. Nichols, P.E.  
President

Attachment

c: Mr. Robert J. Pate  
NRC Region V



P.O. Box 12057, 3008 Cornwallis Rd. Research Triangle Park,  
North Car 27709, U.S.A.

Device - Model # 3241-B, Serial # 65

Source(s) - Serial# 607360, Serial # \_\_\_\_\_

Date of Test: 5-16-89

Please print legibly and firmly

This is your return address label

- Alaska Test Lab
- 4040 B street
- Anch. Ak. 99502
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Telephone: (907)562-2000 Fax# 562-3953

#### LEAK TEST ANALYSIS

This certifies that the sample accompanying this form has been analyzed using an approved monitoring method that measures both beta/gamma & alpha contamination; and, that the results of this analysis shows the removable activity to be less than 0.005 microcuries.