



July 7, 2021

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Clarification to original Response to Apparent Violation in NRC Inspection Report No. 15000037/2021001; EA-21-023

To Whom It May Concern:

Following receipt of our initial "Response to Apparent Violation" document, dated June 15, 2021, our RSO, Jay Yoder spoke with Mr. Shawn Seeley, Inspector for the USNRC, by telephone on July 1, 2021, at 11:05 am. In accordance with their communications, we offer the following clarification to our original response letter.

Based on the December 2019 form 241 application, filed for work in 2020, we provided monthly schedules and the dates of service planned for each month. This information was communicated with the "change" option on the form 241 and was submitted monthly by the technical staff. In our initial document of clarification, dated June 15, 2021, we identified this monthly submission as a 'courtesy'. We wish to rescind that language, as it does not accurately reflect the true nature of the monthly submissions. Based on the initial 2020 application, these change forms were submitted monthly to clearly identify the dates of anticipated service for the upcoming month, consistent with 241 instructions and NRC approvals.

With the submission of our corrected annual form 241 application, dated January 21, 2021, we revised our process and listed the dates of service based on a range. Specifically, the dates scheduled in item #13 were listed as the full year from 1-25-21 to 12-31-21. Additionally, we specified that the number of workdays in item #14 would be the 1st and 3rd Thursday of each month. With this revised form 241, there was no longer the need to send a monthly listing of planned dates. Only in the event of planned additional work, would a revised form 241 be submitted. In March of 2021 we did file a change form 241 for an additional date. This submission adhered to the instructions on form 241 for the addition of a date of service beyond the 1st or 3rd Thursday as listed on the original application.

Please accept our apology for the imprecise use of that verbiage which failed to clarify how our change in procedure has improved our program. We trust you find this clarification helpful as you make your final assessment. We greatly appreciate your diligence as we work to bring this matter to a close. If you have any questions pertaining to this letter, please contact me at 267-539-3750 or our RSO, Jay Yoder, at 866-755-2756, x1.



Sincerely,

Margaret Colarossi

Margaret Colarossi
Administrator
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