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April 29, 2022

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-00011

**Subject: Reply to a Notice of Violation; in NRC Inspection Report 030-30900/2021-001**

To Whom It May Concern:

Following are Teck Alaska Incorporated (TAK) responses to the two alleged violations communicated in US Nuclear Regulatory Commission (USNRC) Notice of Violation (NOV) letter & attachment dated April 7, 2022. Included for each are: (1) the reason for the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

- A. Regarding 10 CFR 20.1101(c), between August 28, 2018 and August 27, 2021, the licensee failed to periodically (at least annually) review the radiation protection program (program) content and implementation. Specifically, the licensee had not performed a review of the radiation protection program for at least 3 years (e.g., 2018, 2019, and 2020).

**Response**

- 1 The reason for the alleged violation: the annual inspection requirement was not completed because the "task" hadn't yet been identified as needing to be incorporated into the Red Dog Operations' (RDO) Environmental Management System (EMS) electronic delegation/ notification/ tracking/ recordkeeping platform, i.e., SiteLine.
- 2 The corrective steps that have been taken and the results achieved: the annual program review task has been entered into SiteLine under the SiteLine "Driver" – RDO NRC Materials License. Going forward, the RDO Radiation Safety Officer (RSO) SiteLine role will annually receive notification that the program review is due, including the completion deadline. Further, if the task deadline is not met after the # of "Escalation Days" as set for the task, the RSO's immediate supervisor will be notified, and if non-completion further continues, the supervisor's supervisor will be notified, etc., up to the RDO General Manager role. Note that completion of the task requires the responsible role's (RSO's) recording of steps taken to properly complete the task.
- 3 The corrective steps that will be taken: the annual program review task has been entered into SiteLine under the Driver – RDO NRC Materials License. Going forward, the RDO RSO SiteLine role will annually receive notification that the program review is due, including the completion deadline. Further, if the task deadline is not met after the # of Escalation Days as set for the task, the RSO's immediate supervisor will be notified, and if non-completion further continues, the supervisor's supervisor will be notified, etc., up to the RDO General Manager role. Note that completion of the task requires the responsible role's (RSO's) recording of steps taken to properly complete the task.

- 4 The date when full compliance will be achieved: by next due-date, 01 May 2022 for SiteLine task, *Perform the Annual Radiation Safety Audit using "RDO Annual Radiation Safety Audit Form" Qualtrax ID# 7088.*

B. Regarding Condition 13 A. of NRC License 50-23289-01, Amendment 20, the licensee failed to test sealed sources for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. Specifically, a Thermo Fisher Scientific NALA device in use between October 31, 2020 and October 2, 2021, having last been tested for leakage and/or contamination on March 31, 2020, a period greater than 6 months.

#### Response

- 1 The reason for the alleged violation: the semi-annual testing requirement was overlooked for greater than six months because the "task" had been administered only through RDO's electronic maintenance system, GenCID, which is not specifically intended to function as a compliance tool, i.e., the task hadn't yet been identified as needing to be incorporated into SiteLine.
- 2 The corrective steps that have been taken and the results achieved: the semi-annual (i.e., twice per year/ every six-months) testing task has been entered into SiteLine under the Driver – RDO NRC Materials License. Going forward, the RDO RSO SiteLine role will receive notification that semi-annual testing is due, including the completion deadline. Further, if the task deadline is not met after the # of Escalation Days as set for the task, the RSO's immediate supervisor will be notified, and if non-completion further continues, the supervisor's supervisor will be notified, etc., up to the RDO General Manager role. Note that completion of the task requires the responsible role's (RSO's) recording of steps taken to properly complete the task.
- 3 The corrective steps that will be taken: the semi-annual testing task has been entered into SiteLine under the Driver – RDO NRC Materials License. Going forward, the RDO RSO SiteLine role will semi-annually receive notification that the program review is due, including the completion deadline. Further, if the task deadline is not met after the # of Escalation Days as set for the task, the RSO's immediate supervisor will be notified, and if non-completion further continues, the supervisor's supervisor will be notified, etc., up to the RDO General Manager role. Note that completion of the task requires the responsible role's (RSO's) recording of steps taken to properly complete the task.
- 4 Leak tests were performed on the device on October 30, 2021 and March 11, 2022. The next due date for the recurring SiteLine task is September 11, 2022.

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**Teck**

If there are any questions, please contact Jason Baucum, RSO, at (907) 754-5208 or (907) 754-5285, or me at (907) 754-5700.

Sincerely,  
Teck Alaska Incorporated

 FOR LES YESNIK

Leslie Yesnik  
General Manager

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