

JAMES A. SEWELL & ASSOCIATES, LLC

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• Civil Engineering • Land Surveying • Building Inspection • Land Use Planning

April 22, 2022

US Nuclear Regulatory Commission
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Washington, DC 20555-0001

US Nuclear Regulatory Commission Region
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Subj: Reply to a Notice of Violation; in NRC inspection report 030-34842/2022-001
Ref:

Notice of Violation dated April 18, 2022 Acknowledgment and Response:

• Security Level IV Violation (Section 6.3.d.4) Hazmat Training

1. Reason for violation;

We had assumed that our annual densometer employee refresher training met the requirements for hazardous materials transportation. For this reason, the gauge users were not instructed to continue with hazardous materials training every 3 years as required.

2. Corrective steps that have been taken and the results achieved;

A hazardous materials training course was purchased from APNGA and made available to the densometer users. Active employees who use the nuclear densometer were instructed to complete the hazardous materials training course prior to use of the densometer.

3. Corrective steps that will be taken;

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Sandpoint Office - 1319 North Division Avenue, Sandpoint, ID 83864 (208)263-4160
Spokane Office - 400 South Jefferson Avenue, Suite 452, Spokane, WA 99204 (509)747-5794

IED7
RGN04
RGN-IV

A schedule for hazardous materials training has been compiled for all employees. This schedule identifies the dates when hazardous materials training must be completed for each user. The schedule is tracked by the business manager and users are notified when renewal of their hazardous materials training must be completed.

4. Date when full compliance will be achieved.

March 7, 2022

● Security Level IV Violation (Section 6.3.d.7) Change of Control

1. Reason for violation;

We understood that the Company, James A. Sewell & Associates, LLC, was listed on the license. We also assumed that new owners did not change the status of James A. Sewell & Associates, LLC being licensed. This was an incorrect assumption.

2. Corrective steps that have been taken and the results achieved;

Documentation of the transfer of ownership with identification of the new owner's was submitted to the NRC on March 15, 2022 for approval.

3. Corrective steps that will be taken;

Prior to transfer of ownership of the business in the future the NRC will be notified, and James A. Sewell and Associates, LLC will receive the Commission's consent prior to completing a transfer of control.

4. Date when full compliance will be achieved.

The transfer of control documentation has been submitted to the NRC for approval. It is our understanding that approval is pending.

● Security Level IV Violation (Section 6.3.d.3) Annual Dose Measurement

1. Reason for violation;

The location of the densometer in the storage area was originally approved through the NRC. We had assumed that approval addressed the annual dose concerns and that nothing in addition was necessary. This was an incorrect assumption.

2. Corrective steps that have been taken and the results achieved;

We have elected to meet compliance with the annual dose limit through measurement. We have purchased a radiation meter to take measurements within the storage area and the adjacent office space. Those measurements have been noted and recorded for future review.

3. Corrective steps that will be taken;

Radiation measurements will be taken annually and recorded. Measurements are recorded in the office space at the desk location which is roughly 8-ft from the gauge. Measurements are also taken in the storage area at the same distance of 8-ft

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from the gauge for comparison purposes. Additional measurements will be taken when and if more than one gauge will be in storage at the Sandpoint location. The measurements will be compared against the threshold limits for maximum dose rate per hour and maximum annual dose rate. In addition, we have elected to construct a concrete wall measuring 4-ft in height on the two sides of the storage area that separate the storage area from the adjacent office space.

4. Date when full compliance will be achieved.
April 8, 2022

Should you need further information please contact me at (509)447-3626. Thank you.

Sincerely,

JAMES A. SEWELL & ASSOCIATES, LLC

By 
Kevin A. Koesel, PE, RSO

pc:

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