



ADAMS Accession# ML22276A250

September 10, 2022

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-001

Docket No. 030-36974
License No. 53-29296-01

RE: Response to the NRC Notice of Violation dated August 12, 2022.

Violation: 10 CFR 36.51(d) requires, in part, that licensees shall conduct safety reviews for irradiator operators at least annually and give each operator a brief written test on the information.

Reason for the violation:

- The RSO (John Kaneko) overlooked this requirement and the annual safety reviews and written tests were not conducted for the irradiator operators as required by 10 CFR 36.51(d).

Corrective Actions taken:

- The RSO has notified (verbally) irradiator operators and the company President (Michael Kohn) of the findings of the July 26, 2022 NRC inspection and August 12, 2022 Notice of Violation.
- The RSO has alerted irradiator operators and the company President of the need for the RSO to conduct annual radiation safety reviews and what to expect in terms of safety topics, directed reading and a brief written test.
- The RSO has reviewed 10 CFR 36.51(d) which lists the review topics and test requirements.
- The RSO is in the process of preparing updated safety information and reading material for the review and written test for irradiator operators.

Corrective Actions that will be taken:

- Conduct annual safety review and a brief written test for irradiator operators on that information.

Date of compliance:

- Completed by October 31, 2022.

Please let me know if additional information or clarification is needed.

Sincerely,



John Kaneko RSO

cc. NRC Docket Control Desk, Washington DC 20555-0001

cc. Director, Division of Radiological Safety and Security, U.S. Regulatory Commission
Region IV, 1600 E. Lamar Blvd., Arlington Texas 76011

cc. Michael Kohn, President, Pa'ina Hawaii LLC.

Email. Lizette Roldan-Otero, PhD, Chief Materials Inspection Branch, Division of Radiological
Safety and Security Lizette.Roldan-Otero@nrc.gov