



# AEROTEST OPERATIONS, INC.

3455 FOSTORIA WAY • SAN RAMON, CA 94583 • (925) 866-1212 • FAX (925) 866-1716

February 27, 2024

ATTENTION: Director, Office of Enforcement  
US Regulatory Commission  
Washington DC 20555-0001

~~ATTENTION: Document Control Desk~~  
U.S. Nuclear Regulatory Commission  
White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Subject: EA-23-118, Violation 050-00228/203  
-001-001A

Dear Director,

I accept the level IV Violation. We have since populated the CFH logs with the historical training and task activity dates and placed documentation in the CFH files.

I do not agree with the NRC Staff arguments provided in the letter dated February 5, 2023 (ML24025A167). I have provided additional information on the training and task activities for a better understanding of the circumstance. From 3/21/19 submission of the CFH plan dated 3/6/19 to the approval of the CFH plan dated 3/30/21 on December 6, 2021, the CFH and CFH Supervisor were following the plan that was being reviewed. The only error was that I did not centralize the required documentation in individual CFH files or document the training on the CFH log sheet. Training and task activities occurred but were recorded in other places.

In reviewing our records,

1. Initial training (CFH Section 4.1 and 5.1) was done on June 16, 2021, with annual training on July 21, 2022, and May 31, 2023. There was a written examination (CFH Section 4.3 and 5.3) on those dates, and everyone passed with 80% or better. This documentation was in the file for annual training and not documented on the summary log in each CFH or CFH supervisor's file. *The CFH summary logs for each CFH and CFH supervisor have been updated.*
2. On-the job training (CFH Section 4.2 and 5.2) has been in place since March 30, 2021, and is ongoing on a daily and continuance basis. Again, this was not

DEP  
IED  
RGN-IV  
NRC/OE

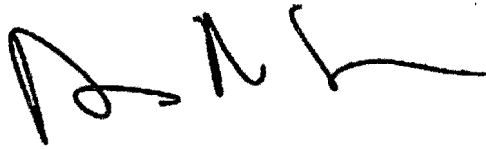
documented on the summary log in each CFH or CFH supervisor's file. *The CFH summary log for each CFH and CFH supervisor has been updated.*

3. Each CFH and CFH supervisor has been maintaining their active status (CFH Section 6.1-6.3). This was logged into the activity task logs for each activity completed and was not documented on the summary log in each CFH or CFH supervisor's file. *The CFH summary log for each CFH and CFH supervisor has been updated.*
4. Aerotest employees that were involved with CFH were Malcolm McCarthy – CFH Supervisor 3/30/21 -11/30/23; David M Slaughter - CFH 3/30/21-11/30/23 and CFH Supervisor 12/1/23 – Present; Jasen Calacino – CFH 3/30/21-Present.
5. On 3/21/19 the CFH plan dated 3/6/19 was submitted to the NRC, Mitch Wilkinson was the acting CFH supervisor from when the last operator left (10/1/19) to 10/9/2020 and Malcom McCarthy after Mitch left (10/9/22 to plan submittal on 11/30/23. (Mitch did training on August 8, 2019 and May 28, 2020; Malcolm did training on May 28, 2020)

If any additional information or clarification is required, please contact me at [dmsraven@gmail.com](mailto:dmsraven@gmail.com) or (801) 631-5919.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 21, 2024.

Respectfully,

A handwritten signature in black ink, appearing to read 'D M Slaughter', written in a cursive style.

David M Slaughter, PhD  
AO President, Reactor Administrator, General Manager. NRC-RO and Manager  
CEO Nuclear Labyrinth LLC.