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GEOTECHNICAL ENGINEERING CONSULTANTS

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February 12, 2025

Mr. Jason vonEhr  
Senior Health Physicist  
Medical and Licensing Assistance Branch  
Division of Radiological Safety and Security  
Region I

SUBJECT: RESPONSE TO 01-28-2025 Additional Information Request Mail  
GEO CIM, INC., MAIL CONTROL NO. 642282

Dear Mr. vonEhr,

This letter is in response to your request for additional information mail, dated January 28, 2025.

After discussing your referenced mail with Rolando Davila, we have decided that no further maintenance and / or repairs beyond the manufacturer's recommended routine maintenance for cleaning and lubrication of the source rod and shutter mechanism will be performed to our gauges by us.

Therefore, the alternate method and procedure suggested in paragraph four (4) of our response letter of January 20, 2025 will not be performed and is deleted from our 2/12/25 updated response letter. Gauges that eventually need any repair and / or maintenance beyond the routine cleaning and lubrication will be placed out of service immediately and will be sent to the manufacturer for the required service.

With regards to the previous maintenance mentioned in our letter dated February 12, 2025, the following additional information is provided:


- The guide plate bolts were loosened or fell while in the field during testing due to wear and tear. The testing technician reported to Rolando Davila that inconsistent results from the readings of the gauge were being obtained. The gauges were brought to the office for inspection and the problem was noted. As Mr. Davila considered that it was a simple issue, he proceeded with the repair not aware that this would be considered as non-routine maintenance. The manufacturer was not contacted at this time.
- The previously mentioned failure of the gauge guide plate bolts interfered only when lowering and positioning the source rod for transmission testing thus affecting the tests results. Over exposure of the source never occurred in any of the three instances as the retracting and safe positioning of the source rod was not affected by the problem. The source rod could be retracted to the safe position in the gauge. Based on this, we did not consider that these events needed to be reported as there was no over exposure that could exceed the regulatory limits.

- There were no previous instances of the same issue as the ones already mentioned in our February 12, 2025 letter.
- As discussed with Rolando Davila, he does not have additional specialized training from the manufacturer to perform any additional service to our gauges other than the routine maintenance of cleaning and lubrication as recommended by the manufacturer. It was agreed that he will no longer perform any kind of maintenance and / or repairs beyond the routine maintenance recommended by the manufacturer and / or as approved by the terms and conditions of our NRC License.

We reaffirm that GEO CIM, INC. PSC is committed to observe, maintain and follow all safety principles in the possession, handling, transportation and use of the nuclear gauges as required by the U.S. Nuclear Regulatory Commission.

If you need any additional information, please do not hesitate to contact us.

Kind regards,



Luis Garcia, P.E.  
President  
Geo Cim, Inc. PSC



Rolando Davila  
RSO  
Geocim, Inc. PSC

[https://d.docs.live.net/3734b9e3a49994be/Documents/NUCLEAR REGULATORY COMMISSION - LOG CLOUD/2024 NRC License Renewal/2024 LICENSE RENEWAL Application Revisions/GEOCIM response TO NRC 2-12-25.docx](https://d.docs.live.net/3734b9e3a49994be/Documents/NUCLEAR%20REGULATORY%20COMMISSION%20-%20LOG%20CLOUD/2024%20NRC%20License%20Renewal/2024%20LICENSE%20RENEWAL%20Application%20Revisions/GEOCIM%20response%20TO%20NRC%202-12-25.docx)