



December 17, 1999

Mr. Kent M. Prendergast  
U.S. Nuclear Regulatory Commission, Region IV  
611 Ryan Plaza Drive, Suite 400  
Arlington, Texas 76011

Subject: Response to On-Site Inspection Performed on Monday, December 6, 1999  
at Testing Engineers - San Diego, Inc. facility, 7895 Convoy Court, Suite 18  
San Diego, California 92111  
California Department of Health Services License No. 5846-37

Dear Mr. Prendergast:

We have prepared this letter in response to twelve items that you requested during your inspection on December 6, 1999, and one item requested in a telephone conversation on December 14, 1999. The queries are listed below with corresponding responses.

- **You requested that we locate a calibrated survey meter, or calibrate ours.** This week we are submitting both of our survey meters to Gamma Tech Industries, San Diego, California, for calibration.
- **You indicated that our gauges need to be leak tested semi-annually.** We currently have six gauges that have been leak tested within the last 12 months, but not within the last six months. We requested 6 leak tests from CPN today. We will leak test these gauges on or before December 24, 1999 and submit the tests for evaluation.
- **You indicated that we should request copies of NRC Form 3 and a copy of 10 CFR Parts 19 and 20 from Ms. Christi Hernandez at your office.** We did that by phone and in writing today.
- **You asked to confirm whether Mr. Bill Estrada worked in areas of exclusive federal jurisdiction with a nuclear gauge while on our staff.** I reviewed our documents and did not find information indicating that Mr. Bill Estrada worked in areas of exclusive federal jurisdiction with a nuclear gauge while on our staff.
- **You suggested that we contact CPN and Troxler representatives to provide certificates for the Type A Nuclear Gauge Transportation and Storage Cases.** We have copies of certificates for the CPN gauge cases on file. We have contacted Mr. Chris Morie of Troxler and we are expecting copies of those certificates for our files.
- **You indicated that we should perform a semi-annual audit of our system per the NRC Guidance Manual Form.** We have reviewed the suggested audit form and intend to perform the audit the first week of January, after receipt of the requested documents from

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Ms. Hernandez.

- **You suggested that we perform DOT training for our field technicians.** We reviewed DOT requirements with the technicians during a staff meeting on Wednesday, December 15, 1999. Each technician also received copies of the DOT requirements for their files.
- **You suggested that we post a memorandum for the technicians indicating that 10 CFR Parts 19 and 20 are available for viewing.** We issued a memo to each technician today indicating that they are available for viewing in the office of Mr. Doug Provins.
- **You requested that provide annual retraining for the technicians.** As indicated, we reviewed DOT requirements in a staff meeting on December 15, 1999, and have scheduled a staff meeting that will include retraining for January 6, 2000.
- **You requested that we obtain a 24-hour emergency number (from Maurer, CPN, or?), and include that in our revised shipping papers.** Doug Carter of CPN provided me with (800) 535-5053. Our shipping papers have been revised to reflect this change and are included herein.
- **You requested that we revise our shipping papers so that there is a specific paper for each gauge.** Our shipping papers have been revised to reflect this change and are included herein.
- **You requested that we revise our shipping papers so that they include metric (SI) units.** Our shipping papers have been revised to reflect this change and are included herein.
- **In your telephone call on December 14, 1999, you requested that we indicate specific dates, locations, project names, and technician names for several jobs performed recently by our staff in areas of exclusive federal jurisdiction.** We have summarized that information herein as Table 1.

We thank you in advance for your continued assistance with this process. Please feel free to contact Doug Provins with any questions that you may have at (858) 715-5800.

Respectfully submitted,  
**TESTING ENGINEERS - SAN DIEGO, INC.**



R. Douglas Provins, PE  
Senior Engineer, Manager of Laboratory Services  
Assistant Radiation Safety Officer

RDP/LC/rdp

Attachments.

**Table 1 - Selected Dates and Locations of Work Performed in Areas of Exclusive Federal Jurisdiction**

<b>Project Location</b>	<b>Project Name*</b>	<b>Date Work Performed</b>
Naval Air Station, North Island	Mixed Waste Storage Facility	November 3, 1999
32 <sup>nd</sup> Street Naval Station	General Purpose Warehouse	December 15, 1999
Barstow Daggett Heliport	Barstow Daggett Heliport	November 1 to December 31, 1999
Marine Corps Base, Camp Pendleton	Santa Margarita River Flood Control Project	November 1 to December 31, 1999

\*Contact names and numbers can be provided upon request.

**APPENDIX A - REVISED SHIPPING PAPERS**

*Gauge Specific*

*SI units*

# SHIPPING PAPERS

one case, R.Q., RADIOACTIVE MATERIAL,  
 SPECIAL FORM, N.O.S., 7, UN2974  
 RADIOACTIVE YELLOW II Label  
 Transport Index 0.4  
 USA DOT 7A PACKAGE

SOURCES (CHECK APPROPRIATE GAUGE ID) Date: \_\_\_\_\_

GAUGE ID	MODEL	SOURCE	S/N	mCi	GBq
4909	CPN, MC-1	Cs-137/Am-241/Be	M13114909	7.9/40	0.30/1.52
<del>2537</del>	<del>CPN, MC-M</del>	<del>Am-241</del>	<del>MM8102537</del>	<del>5.0</del>	<del>1.9</del>
<del>1078</del>	<del>CPN, MC-3</del>	<del>Cs-137/Am-241/Be</del>	<del>M320901078</del>	<del>10/40</del>	<del>0.38/1.9</del>
<del>0726</del>	<del>CPN, MC-3</del>	<del>Cs-137/Am-241/Be</del>	<del>M30079726</del>	<del>10/40</del>	<del>0.38/1.9</del>
<del>0502</del>	<del>CPN, MC-3</del>	<del>Cs-137/Am-241/Be</del>	<del>M310900502</del>	<del>10/40</del>	<del>0.38/1.9</del>
<del>4036</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>CG-1074/47-8553</del>	<del>7.8/40</del>	<del>0.30/1.52</del>
<del>4127</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>40-1141/47-183</del>	<del>8.0/40</del>	<del>0.30/1.52</del>
<del>4287</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>CG-1257/Caa-302</del>	<del>8.0/40</del>	<del>0.30/1.52</del>
<del>5275</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>CG-2320/Caa-1393</del>	<del>8.0/40</del>	<del>0.30/1.52</del>
<del>7299</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>CG-4359/Caa-3570</del>	<del>8.0/40</del>	<del>0.30/1.52</del>
<del>7333</del>	<del>Trox, 3411-B</del>	<del>Cs-137/Am-241/Be</del>	<del>CG-4389/Caa-3611</del>	<del>8.0/40</del>	<del>0.30/1.52</del>
10635	Trox, 3411-B	Cs-137/Am-241/Be	40-8073/46-2057	8.0/40	0.30/1.52

177.817(e) Shipping paper accessibility - accident or inspection. A driver of a motor vehicle containing hazardous material shall insure that the shipping paper required by this section is readily available to, and recognizable by, authorities in the event of an accident or an inspection. Specifically, the driver and the carrier shall:

- (1) Clearly distinguish the shipping paper, if it is carried with other shipping papers or paper of any kind, by either distinctively tabbing it or having it appear first; and
- (2) Store the shipping paper as follows:
  - (i) When the driver is at the vehicle controls, the shipping paper shall be:
    - (A) within his/her immediate reach while he/she is restrained by the lap belt; and
    - (B) either readily visible to a person entering the driver's compartment or in a holder which is mounted to the inside of the door on the driver's side of the vehicle.
  - (ii) When the driver is not at the vehicle controls, the shipping paper shall be:
    - (A) in a holder which is mounted to the inside of the door on the driver's side of the vehicle, or (B) on the driver's seat in the vehicle.

*24-Hour #*

**IN CASE OF EMERGENCY 24-HOUR EMERGENCY NO.**  
 RADIATION HEALTH  
 TESTING ENGINEERS - SAN DIEGO, INC.  
 RADIATION SAFETY OFFICER:  
 ASST. RADIATION SAFETY OFFICER:  
 POLICE: 911  
 FIRE DEPARTMENT: 911

(800) 535-5053  
 (800) 852-7550  
 (858) 715-3800  
 Larry Clark (home) (619) 279-8416  
 Doug Provins (home) (619) 337-0061  
 Business (858) 495-7900  
 Business (858) 593-4477

**READ BACK OF THIS FORM FOR EMERGENCY RESPONSE INFORMATION**

# EMERGENCY RESPONSE INFORMATION

49 CFR 172.602

ERG GUIDE 64

This emergency information applies to the following shipping description:  
**RADIOACTIVE MATERIAL, R.Q., SPECIAL FORM N.O.S. UN2974, CLASS 7**

## POTENTIAL HAZARDS

### HEALTH HAZARDS

- Low level radioactive material; little personal radiation hazard.
- Materials in Special Form are not expected to cause contamination in accidents.
- Undamaged packages are safe; damaged packages or materials released from packages can cause external radiation hazards.
- Packages identified as "Type A" by marking on packages or by shipping papers do not contain a life endangering quantity.
- Commonly available instruments can detect most of these materials.

### FIRE OR EXPLOSION

- No risk of fire or explosion.
- Packaging can be consumed without content loss from sealed source capsule.
- Radioactive source capsules are designed to withstand temperatures of 1475°F (800°C).

## EMERGENCY ACTION

### IMMEDIATE PRECAUTIONS

- Priority response actions may be performed before taking radiation measurements.
- Priorities are life saving, control of fire and other hazards, and first aid.
- Isolate hazard area and deny entry. Notify Radiation Authority of accident conditions.
- Delay final cleanup until instructions or advice of Radiation Authority.

### FIRE

- Do not move damaged packages; move undamaged packages out of fire zone.
- Small Fires: Dry chemical, CO<sub>2</sub>, water spray or regular foam.
- Large Fires: Water spray, fog (flooding amounts).
- Water from cargo fire control is not expected to cause pollution.

### SPILL OR LEAK

- Damage to outer container is not expected to affect sealed sources.
- Do not touch damaged packages or spilled material.
- If source is identified as being out of package; stay away and await advice from Radiation Authority.

### FIRST AID

- Use first aid treatment according to the nature of the injury.
- Persons exposed to special form sources are not likely to be contaminated with radioactive material.