



GeoSystems Consultants, Inc.

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December 1, 2004

U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, D.C. 20555

SUBJECT: Reply to a Notice of Violation

Docket No. 03033210

License No. 37-30050-01

Gentlemen:

Pursuant to the provisions of 10 CFR 2.201, GeoSystems Consultants, Inc. is submitting this written reply to the U.S. Nuclear Regulatory Commission November 9, 2004 Notice of Violation(Notice) letter issued by Mr. John D. Kinneman, Chief, Materials Security & Safety Branch, Division of Nuclear Materials Safety. As requested, for each of the four Items A, B, C, and D included in the Notice, the reply includes the reason for the reported violation, the corrective steps taken and results achieved, the corrective steps to be taken to avoid further violations, and the date when full compliance will be achieved.

If you have any questions concerning the contents of this reply, please do not hesitate to contact us.

Very truly yours,

GEOSYSTEMS CONSULTANTS, INC.

Craig R. Calabria, Ph.D., P.E.

Radiation Safety Officer

Principal

CRC

cc: US NRC Regional Administrator, Region I

IE07

REPLY TO A NOTICE OF VIOLATION

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Item A: Between January 1, 2000 and September 29, 2004, the licensee did not periodically (at least annually) review the radiation protection program content and implementation. Specifically, the licensee has not conducted an annual program review since 1999.

Reply to Item A: Representatives from GeoSystems Consultants, Inc. (GSC) periodically perform an informal review of the GSC Radiation Protection Program. The GSC Radiation Protection Program document 3-ring binder is readily available to all GSC personnel on a bookshelf in the common office space area. A formal annual review program that included a corresponding annual review documentation sheet had not been implemented.

The corrective steps taken include the GSC implementation of a GeoSystems Annual Radiation Protection Program Review Form and a program review checklist with a dated reviewer signature to be compiled during GeoSystems' annual winter licensed gauge recalibration/service program. The corrective steps to be taken to avoid further violations include the requirement of the co-signature of this form by the GeoSystems Consultants, Inc. Radiation Safety Officer and the inclusion of this completed form within a clearly visible document pocket in front of the GSC Radiation Protection Program document in the above-referenced Program 3-ring binder. The date when full compliance will be achieved is February 28, 2005 upon completion of the GSC annual winter gauge recalibration/service program. The results of these steps provide a fully-documented annual radiation protection program review program.

Item B: Between January 1, 2000 and September 29, 2004, hazmat employees did not receive hazmat training at least once every three years. Specifically, two authorized gauge users did not have the hazmat refresher training within the past three years even though they transported the portable nuclear density gauge.

Reply to Item B: The reason for the Item B reported violation was only the GSC authorized gauge users that had completed the annual 8-hour OSHA HAZMAT Refresher Training were in compliance with the requirement to receive hazmat training at least once every three years. The corrective steps taken include the GSC implementation of a GeoSystems Consultants, Inc. internal hazmat training seminar for all GSC authorized gauge users to be conducted under the direct supervision of the GSC Radiation Safety Officer and the implementation of a GeoSystems HAZMAT Refresher Training Schedule Status Form which details the current HAZMAT Refresher Training status of each GSC authorized gauge user. The seminar will be formatted based on the Troxler Electronic Laboratories HAZMAT Re-certification Seminar presented on December 1, 2004. The corrective steps to be taken to avoid further violations include the requirement of the signature of this newly-implemented HAZMAT Refresher Training Schedule Status Form by the GeoSystems Consultants, Inc. Radiation Safety Officer on an annual basis and the inclusion of this completed form within a clearly

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visible document pocket in front of the GSC Radiation Protection Program document in the above-referenced Program 3-ring binder. The date when full compliance will be achieved is February 25, 2005. The results of these steps provide hazmat refresher training to all GeoSystems authorized gauge users at least once every three years.

Item C: Contrary to the 10 CFR 71.5(a) requirement that "when the driver is not at the vehicle's 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", on September 29, 2004, while a gauge user was not at the controls of his vehicle, the shipping paper was not in a holder mounted to the inside of the door on the driver's side of the vehicle or on the driver's seat in the vehicle. Specifically, an authorized gauge user at a temporary job site had the shipping papers and emergency notification information stored inside the locked gauge case which was located in the trunk of his vehicle.

Reply to Item C: The reason for the Item C reported violation was the authorized gauge user had forgotten to place the shipping papers and emergency notification information on the driver's seat in his vehicle. The corrective steps taken include the GSC implementation of the placement of readily-available laminated copies of the gauge shipping papers and emergency notification information in the GeoSystems Consultants, Inc. office gauge storage area and the posting of a sign in the immediate vicinity of the gauge storage/user sign-in/out log reminding all authorized gauge users to place a copy of the shipping papers and emergency notification information on the driver's seat in the user's vehicle. The corrective steps to be taken to avoid further violations include a memo to be issued by a Principal of GeoSystems Consultants, Inc. to all GSC authorized gauge users stating the mandatory requirement of compliance with this measure and the posting of additional reminder signs within the individual gauge cases as frequent reminders during gauge usage. The date when full compliance will be achieved is December 10, 2004. The results of these steps are repeated visual reminders to all authorized gauge users to place the shipping papers and emergency notification information on the driver's seat in the user's vehicle.

Item D: Contrary to the 10 CFR 20.1902(e) requirement, on September 29, 2004 the licensee did not post each area or room in which certain amounts of licensed material, specified in 20.1902(e), are stored, with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" or "DANGER, RADIOACTIVE MATERIAL(S)." Specifically, the storage room at the Ft. Washington office, an area or room in which portable gauges containing Cs-137 and Am-241 are stored, was not posted with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" or "DANGER, RADIOACTIVE MATERIAL(S)."

Reply to Item D: The reason for the Item D reported violation was that the previously-placed magnetic sign on the exterior door of the storage room at the Ft. Washington office bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" had been displaced/lost during repairs to the office subsequent to flooding damage. The corrective steps taken include the placement of a conspicuous sign bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" on the exterior door of this storage room which was performed immediately subsequent to the NRC safety inspection at the GeoSystems Consultants, Inc. office on September 29, 2004 and

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investigating the availability of a replacement magnetic sign bearing the above-reference radiation symbol and words. The corrective steps to be taken to avoid further violations include obtaining and permanently displaying a replacement magnetic sign bearing the above-reference radiation symbol and words on the exterior door of this storage room. Full compliance with this requirement was achieved on September 29, 2004 with the placement of a conspicuous sign bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" on the exterior door of this storage room immediately subsequent to the NRC safety inspection at the GeoSystems Consultants, Inc. office. The results of these steps are current and future compliance with the 10 CFR 20.1902(e) requirement.