

March 9, 2004

GEOTECHNICAL SPECIALTIES, INC.



United States Nuclear Regulatory Commission

Document Control Desk
Washington, D.C 20555

Region 1
475 Allendale Road
King of Prussia, PA 19406

Attn: Mr. John D. Kinneman, Chief
Security and Industrial Branch
Division of Nuclear Materials Safety

Re: License No. 45-25413-01
Inspection 03034557
Notice of Violation - Reply

Gentlemen,

On January 5, 2005 this office received a formal Notice of Violation resulting from Inspection 03034557 dated November 17-18, 2004 and conducted by Mr. Jim Schmidt of your agency. This letter responds, per itemized list, to the referenced citation.

ITEM A: Device improperly locked on-site.

- 1) The reason for this violation was simple oversight. The gage had been in infrequent use with the exception of the past several days, where frequent, poorly scheduled requests for service were made. The late afternoon request that coincided with Mr. Schmidt's arrival was attended to in a rush, with the trigger lock removed at the office.
- 2) Re-emphasized the requirement to properly secure the device while away from the office.
- 3) See item 2 above
- 4) Full compliance with this corrective action was achieved on November 18, 2004.

ITEM B: Device transported without proper documentation

- 1) The transport manifest was left at the office along with the trigger lock as in ITEM A above.
- 2) As per ITEM A above.

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- 3) As per ITEM A above.
- 4) As per ITEM A above.

ITEM C: Lack of Training Updates

- 1) As was discussed with Mr. Schmidt, the referenced gage had been out of use for over 2 years and stored on site pending acquisition of another project that may have need of this service. During that time, maintenance of training records lagged.
- 2) An RSO training class update has been scheduled for 4/20/05 at Humboldt Scientific in Raleigh, NC to address this issue. In the interim, two additional employees have undergone the basic radiation safety training / operator training offered by Humboldt.
- 3) A regular schedule of RSO updates is to be added to the GSI QC manual to prevent recurrence of this lapse.
- 4) Full compliance with this item should be achieved by 4/20/05.

ITEM D: Expired Leak Test duration

- 1) The referenced gage was stored for over 2 years due to not having any project in inventory that required its use. During that time, leak testing was not required. Upon, re-activation, leak testing was neglected, due to the length of time of inactivity.
- 2) Upon notification of this violation, a leak test was immediately performed.
- 3) This item will also be added to the GSI QC manual to prevent recurrence.
- 4) Full compliance with this item was achieved on 11/29/04.

ITEM E: Annual review of Radiation Safety Program

- 1) As RSO, I was not aware that documentation of an annual review of the Radiation Safety Program was required.
- 2) Upon notification, this item was scheduled to add to the GSI QC manual for regular inclusion in annual reviews.
- 3) This item will be included in the QC reviews and will be attended to on an annual basis.

- 4) Full compliance for this item was achieved as of the date of notification, 11/18/04.

We hope that this response adequately meets your requirements and we apologize for the delay in delivering this reply to you. Please feel free to contact our office at your convenience with any questions or concerns you may have.

Sincerely,

GEOTECHNICAL SPECIALTIES, INC.



Bruce R. Spiro, P.E.
PRESIDENT