

# PITS

Professional Inspection  
And  
Testing Services, Inc.

## CORPORATE OFFICE

56 North Second Street  
Chambersburg PA 17201  
Phone: 717-263-7964  
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## BRANCH OFFICES

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Phone/Fax: 301-829-2296

1990 M St., NW  
Washington, DC 20036  
Phone: 202-223-9311  
Fax: 717-263-7734

## ON-SITE OFFICES

Office and Fully Equipped  
Laboratory Located at  
Dulles International Airport  
South Staging Area  
3601 Stonecroft Blvd  
Chantilly, VA 20151  
Phone: 703-572-3346  
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WEB SITE  
www.p-i-t-s.org

EMAIL  
email:pits@innernet.net

## MINORITY CERTIFICATIONS

Penn DOT  
MDOT  
WVDOT  
Allegheny County, PA  
MWAA  
WMATA  
City of Harrisburg  
PA DGS  
Amtrak  
SEPTA  
District of Columbia  
Prince George's County

## LAB CERTIFICATIONS

AASHTO  
Corps of Engineers  
NIST/CCRRL

June 9, 2005

Certified Mail # 70042890000071169709

U.S. Nuclear Regulatory Commission  
Mailstop O3HH  
Washington, DC 20555  
Attn: Document Control Desk

Re: **Reply to a Notice of Violation**  
**Professional Inspection & Testing Services, Inc.**  
**License No. 37-28744-01**  
**Inspection 03032721/2004002**

Gentlemen,

We hereby submit our reply to a Notice of Violation for the above referenced Notice and Inspection. The violation and Inspection referenced N. are as indicated.

We have reviewed your notification letter and requirements dated May 16, 2005 and respond as follows to the three violations designated A, B, and C of the NRC notification.

### A. Condition 11- Troxler Training

#### 1. Reason for Violation

We acknowledge this requirement and have records to substantiate the Certification of our technicians by Troxler. We misinterpreted the Landaur Safety Course as a training course that, in addition to, various safety training protocols, including, training for Portable Density Reading Equipment (Gauges). We used Landaur for a 10 month period. This was our mistake and we are responsible for this violation.

#### 2. Corrective Steps/Results

We have implemented new screening and orientation procedures to rectify and preclude the reoccurrence of this violation. All personnel now receive training only by authorized Troxler personnel and firms certified by Troxler and/or approved by the NRC to provide this training. Since March 2004 all personnel have been provided the approved training. Technicians are not able to handle the gauges without this training and certification.

#### 3. Corrective Steps/ Future Violations

All new hires are screened and we must receive a Troxler Certification for any technician to operate our gauge equipment and place it on file. If personnel do not provide such certification, they must complete the Troxler Course as described in Item 2.

#### 4. Date of Compliance

We were in full compliance with respect to Condition 11 as of April 01, 2004.

TEO

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## B. Condition 12- Approved RSO

### 1. Reason for Violation

We had improperly implemented our Lab Manager as active RSO after March 4, 2004. Our Lab Manager had worked in conjunction with the Approved RSO for 3 years and was aware of the procedures as RSO. We did not verify the proper procedure for the transition of these RSO responsibilities and requirements pursuant to our NRC license. Additionally, we did not provide the NRC with the Amendment Protocol Requirements.

### 2. Corrective Steps/ Results

We have reviewed these procedures and requirements of our NRC license for the RSO with our appropriate responsible personnel. Our Lab Manager was submitted by Amendment Request and has been subsequently approved.

### 3. Corrective Steps/ Future Violations

Proper understanding of the License requirements for the RSO and the guidelines for amendment as required. We are reviewing our properly trained personnel for RSO responsibility should conditions warrant a future change, which will be implemented only by the proper amendment request to the NRC.

### 4. Date of Compliance

We were in full compliance of Condition 12 as of June 2, 2004.

## C. Condition 22- Calibrated Survey Instrument/ Emergency Response

### 1. Reason for Violation

We did not properly record the date for calibration and frequency and as a result the Equipment Calibration Frequency Period lapsed.

### 2. Corrective Steps/ Results

We sent our survey monitoring device to be calibrated and will enforce bi-annual calibrations. Calibration dates are posted in the NRC required file.

### 3. Corrective Steps/ Future Violations

The Survey Calibration Frequency Period and date is now in our records and is posted so that it will be calibrated within the last 60 days of the Frequency Requirement. We are also now reviewing NRC Requirements and Regulations to amend the Frequency Period by revised Commitment Letter to coincide with the equipment manufacturer's requirements.

### 4. Date of Compliance

We were in full compliance with Condition 22 on April of 2005.

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In addition to the information and requirements herein please be advised that we have implemented changes in our procedures and policies as outlined by Item 1 thru 8 in our May 05, 2004 Occurrence "Theft Report" to the NRC.

We are confident that these procedures, our complete review of our NRC License, and all regulations and the evaluation of our "In-house" administration and record keeping practice will preclude any future occurrence of the subject violation and, further, will insure that all regulatory requirements and guidelines of our NRC License will remain in full compliance.

Sincerely,

  
Richard K. Curtis  
Vice President

/dmr

cc: NRC- Region 1  
R. McNew