



U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

January 6, 2006

Dear Sir or Madam:

RE: Reply to a Notice of Violation

I am replying to the attached Notice of Violation, which I received in the mail yesterday.

A. 10 CFR 20.1101(c): Annual audit of radiation protection program.

**Reason for violation:** PGT underwent a downsizing of staff in 2001 and the Radiation Safety Officer was replaced at that time. Unfortunately, the new RSO overlooked his responsibility to conduct annual audits of the program from 2002, 2003 and 2004. The RSO was replaced again in 2005.

**Corrective steps:** The annual audit for 2005 was conducted on November 17, 2005 and submitted to the NRC Region 1 office on November 21, 2005.

**Corrective Steps to avoid further violations:** At the time of each audit, a scheduled date for the next audit will be established to avoid this requirement being overlooked. The 2006 audit is scheduled for Wednesday, September 13, 2006.

**Date for full compliance:** Following the completion of the 2005 audit, PGT is currently in compliance with the requirement to conduct an annual audit, but a three-year history of audit records will not be available until after 2007.

B. Condition 15 of License 29-12783-01: Wipe test sensitivity for Sr-90 source.

**Reason for violation:** PGT had been using a High-Purity Germanium detector to conduct all wipe test measurements, including those from a Beta emitting Sr-90 source. PGT believed that the sensitivity of the HPGe detector to Sr-90 was adequate to meet the 0.005 microcurie requirement. However, calibration tests performed on November 17, 2005 indicated that under worst-case conditions the sensitivity might be only 0.009 microcurie. The fundamental problem is that while the HPGe detector is sensitive to Beta radiation, it is primarily a Gamma-radiation detecting device.

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**Corrective steps:** The Sr-90 source wipe test was conducted on November 17, 2005 with a calibrated Beta radiation monitor, (Ludlum Model 3 and Ludlum 44-9 Pancake GM tube), sensitive to less than 0.001 microcurie of Sr-90 under our measurement conditions, according to the detection efficiency calibration provided by the manufacturer. No Beta radiation was detected above background.

**Corrective Steps to avoid further violations:** The PGT wipe test procedure has been changed to state that the Beta radiation monitor must be used when conducting the Sr-90 wipe test.

**Date for full compliance:** Following the change in the wipe test procedure, PGT is now in compliance with this license requirement.

It is PGT's sincere intention to be in compliance with all aspects of NRC regulations, and I trust that the above information addresses the violations. But please let me know immediately if any of the above response inadequate or incomplete.

Sincerely,



Christopher E. Cox  
RSO and President

CC:

David Carpenter, Assistant RSO  
James P. Dwyer, NRC Region 1 office