



**FROEHLING & ROBERTSON, INC.**  
GEOTECHNICAL • ENVIRONMENTAL • MATERIALS  
ENGINEERS • LABORATORIES  
"OVER ONE HUNDRED YEARS OF SERVICE"

November 21, 2006

LO

United States  
Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

RECEIVED  
REGION 1  
2006 NOV 29 PM 3:19

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

Reference: License No. 45-08890-01  
Inspection 03006579/2006001, September 26-29, 2006  
Notice of Violation

Gentlemen:

We have received the Notice of Violation and understand it to be a failure on the part of the Radiographer in our Roanoke facility to fully secure the AEA Model 660 B exposure device within the designated locked storage container within the locked permanent storage facilities. This was obviously a mental lapse on the part of the Radiographer, who also felt that the facility was safe due to its location within the complex. On the other hand, we do see that this action circumvented the double-lock security for which we strive, so we cannot contest the violation as written.

The Radiographer has been informed of the violation, and instructed to fully secure the device when it is not in use or under surveillance. This will also be made a point of review during our regular inspection visits. In addition, a laminated poster describing proper procedure is being furnished to all radiographic facilities as a physical reminder of the correct procedure to be followed. A facsimile of the poster is attached.

Generally, we feel that corrective actions undertaken would guard against recurrence of such violations, and that the effective date of full compliance would

HEADQUARTERS: 3015 DUMBARTON ROAD • BOX 27524 • RICHMOND, VA 23261-7524  
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! NMSS/RGNI MATERIALS-004

be that of this letter. Should you have any questions or require additional information, please do not hesitate to contact me at your convenience.

Respectfully submitted,  
Froehling & Robertson, Inc.

A handwritten signature in black ink, appearing to read "William W. Briody", with a long horizontal flourish extending to the right.

William W. Briody  
Corporate Radiation Safety Officer  
Vice-President

cc: Samuel H, Kirby, Jr, President  
Don Sipher, Regional Vice President  
Roanoke Office  
File

# **ATTENTION**

## **ALL RADIOGRAPHIC TESTING PERSONNEL**

The radiographic exposure device must be returned to locked storage when not in use or left unattended for any period of time, even if the exterior facility lock is in place.

Failure to do so violates the required double-lock security requirement of our license as well as the basic security policies regarding access to controlled areas.