

Timothy M. Goold



April 9, 2012

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

In Regards to Apparent Violation, EA-12-010

Before all else, I would like to openly admit to all faults that occurred due to my lapse of judgment on July 27th, 2011. The series of events that ensued should never have happened and though I cannot change the past, regardless of the circumstances, I have learned volumes from the experience that could not have been gained through years of classes or seminars.

As far as a reason as to what occurred, there is nothing worthy of mention here. I had no reason to think that the NRC and its employees were anything less than what they were, just an organization looking out for my own safety as well as those people around me. Throughout my career, I have heard many exaggerated stories about the methods and intentions of the NRC, and though I didn't have at the time, and still do not, have any proof of such stories, upon the surprise encounter with Rick Muñoz there was little else I could think of. After having been given the opportunity to sit with Rick Muñoz and Mary Kay Fahey I was able to look past my preconceived stereotypes and recognize that the employees of the NRC are just regular, decent people doing their jobs just as I was.

In explanation of my violation to (10 CFR) 34.41(a), conducting radiation with only one person, I again admit that the mistake was fully mine. Due to the layout of where we were shooting, in order to have 100% control of our area, we were unable to see each other during exposures. It is because of this that when my second person returned to the darkroom with the film I did not realize that he had left the area. Should I be made to work in the same area again, I don't know how to rectify the fact that I could not see him but in learning from my mistakes, I will always make sure to at least have vocal affirmation that he is both there and ready to perform the exposure. If that is also not applicable, I can see no way to safely and confidently conduct the work without the use of radio or other means of communication. It is my promise to myself and all concerned that I will never put myself or anyone else in such a predicament by working in such a way as I do not have constant contact with the people I am working with during exposures.

In explanation of my violation of (10 CFR) 30.52, there is again no excuse as to my actions. As stated previously, throughout my employment there have been many horror stories shared as to the nature and intentions of the NRC and similar agencies (stories about the State Police and IRS come to mind). I don't blame those people for sharing those stories, but I do blame myself to taking them as more than what they are, and that is

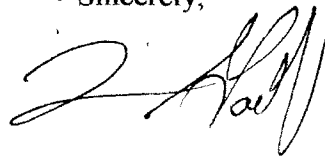
just stories. I had never before encountered the NRC and naively did not expect to see them during my career. When I encountered Mr. Muñoz, my judgment was clouded and I was in no way thinking clearly. In finding myself already with the previous violation, I was not thinking clearly and, as the report says, vaulted the camera, informed my level II of the NRC presence, and then quickly made my way to the smoke shack on the North side of the island. Not knowing what to do, I remained at that location waiting for my technician to have his meeting with Mr. Muñoz and dealing with stress in the way I had become accustomed during my temporary residency in Alaska; smoking.

During the past months I have had a lot of time to reflect on what happened and can think of no good reasons why any of it happened. I know that performing radiography by yourself is not allowed because one person is unable to maintain adequate control of an area such as where we were working and if something were to happen, it would have been impossible for one of us to go for help while the other maintained our barriers. I understand that, without both persons having complete knowledge of what is going on, there are a multitude of things that may go seriously wrong. I also know that the employees of the NRC are not boogiemens looking to crucify us at every opportunity, but are there to ensure that we, as radiographers, are doing our jobs in accordance to the rules that have been set for our own protection. Even if I don't think I have anything to add to the investigation I will still be standing at the side and at the ready to assist if such an opportunity arises.

In closing, I would like to say that during this debacle I have learned volumes. The only thing I can think of to emphasize how entirely these lessons have been imprinted on me would be to compare it to someone who ended up in a car accident due to drinking and driving. Just as he would be a fool not to realize that some risks aren't worth taking, I have a new perspective on both the dangers and precautions that need to be taken into consideration in order to perform radiography safely.

Thank you very much for your consideration and understanding of my actions during what occurred on July 27th. Though you have already given me undeserved opportunities to explain myself, if there are still any questions or items which require further explanation, please feel free to utilize the phone number to address above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy M. Goold', written in a cursive style.

Timothy M. Goold