

April 5, 2014

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-001

Re: Reply to a Notice of Violation, NRC Inspection Report 030-37441/2014-001

This is a response to the letter dated March 27, 2014 regarding NRC Inspection Report 030-37441/2014-001 and Notice of Violation.

R&M Engineering-Ketchikan, Inc. does not dispute or contest the basis for the Level IV violations referenced in your report. All excuses aside, Trevor Sande, Owner, President and RSO of R&M Engineering-Ketchikan, Inc. realizes that laxity and inadequate delegation of responsibility led to our failure to comply as detailed in your report. Clearly, this was a wake-up call to which we will give our full attention and due diligence in correcting.

We have implemented corrective steps to bring us into full compliance which include:

- Assigning a new Radiation Safety Officer to ensure that our radiation protection program is compliant.  
Guy Owens (R&M's Field and Laboratory Manager) will fulfill this function and he has received updated training and certification through the American Technical Institute to supplement his 30 years of experience and past training in the field of nuclear safety. His current certification, already submitted to your office, is dated Feb. 22, 2014.
- Implement formalized training and certification for applicable personnel.  
Most of R&M's applicable personnel have been recently updated and/or received initial training and certification in Portable Nuclear Density/Moisture Gauge Use and Safety Training and Hazmat Training regardless of their certification status. This was accomplished between the dates of February 12, 2014 and March 16, 2014. The few outstanding personnel that still require such are in the process of getting training and certification and will only be authorized to use and transport a nuclear gauge once that process is complete and have satisfactorily demonstrated competence.
- Submission of a letter to the U.S.NRC dated February 18, 2014, to amend our license to reflect changes in our possession limits, nuclear gauge storage locations and the addition of Guy Owens as RSO.
- Documented our most recent audit of our radiation safety program which was performed on Feb. 14, 2014 with follow-ups to address non-compliant items. All non-compliant items identified in the initial report have been addressed. Future auditing will at a minimum be performed bi-annually.

JE07  
RSM

We appreciate your consideration of this response.

Sincerely,

R&M Engineering-Ketchikan, Inc.

A handwritten signature in black ink, appearing to read "Trevor Sande". The signature is fluid and cursive, with the first name "Trevor" and last name "Sande" clearly distinguishable.

Trevor Sande, P.E., President

Cc: Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas, 76011  
Guy Owens, R&M Engineering-Ketchikan RSO