



WILLIAM B. BENESEK, PE
DIRECTOR OF TRANSPORTATION
(636) 477-6600, EXT. 1390

August 1, 2014

United States Nuclear Regulatory Commission, Region III
2443 Warrensville Road Suite 210
Lisle, IL 60532-4352

Attn: Document Control Desk, Washington DC 20555-001

RE: Response to the Apparent Violations in Inspection Report No. 03018256/2014001 (DNMS);
EA-14-106
(Supplement to Response of Apparent Violations Letter Dated July 31, 2014)

This letter is a supplement to the City of St. Peters' Response to Apparent Violations as stated in Inspection Report No. 03018256/2014001 (DNMS); EA-14-106, dated July 31, 2014. The intent of this letter is to identify and clarify the corrective actions that have and will be taken by the City of St. Peters ensure City staff assigned to use the regulated portable gauges are qualified for their use through proper documented training as required by License Condition No. 12 of the City of St. Peters Nuclear Regulatory Commission (NRC) license. This apparent violation is noted in the NRC Routine Inspection Report No. 03018256/2014001 (DNMS) and Notice of Violation letter, dated July 1, 2014.

This letter further describes actions that have and will be taken by the City of St. Peters to ensure its nuclear safety program is in compliance with its NRC license and NRC guidelines. The corrective action items listed below are also to be considered applicable to the corrective action taken to address the three (3) violations of NRC requirements noted in the NRC Routine Inspection Report No. 03018256/2014001 (DNMS) and Notice of Violation letter, dated July 1, 2014.

Use of Permitted Portable Gauges By Authorized Personnel

It is the policy and practice of the City of St. Peters to ensure its staff is properly trained and qualified to operate equipment such as the regulated portable gauges permitted in its NRC license. While training by City staff considered qualified and competent on the safe operation and transport of the regulated portable gauges was given before use, it is now clear the training provided in 2009 did not meet the minimum requirements as described in Appendix D of NRC's *Consolidated Guide About Materials Licenses* (NUREG-1556, Vol. 1, Rev 1). With clear understanding of these guidelines, the City of St. Peters will not allow the portable gauges listed in its NRC permit to be operated or transported by persons who are not properly trained and qualified in compliance with Appendix D of NUREG-1556, Vol. 1, Rev. 1 and its NRC license. Further use of the regulated portable gauges will be prohibited until NRC compliant RSO certification training and manufacturer specific portable gauge users training with the designated RSO is completed as described below.

RSO and City Staff User Training:

The City will host NRC compliant RSO certification training for the City's designated RSO (Jason Lewis) and an additional City staff member. This additional City staff member will also be stationed at the permitted gauge storage facility at 100 Boone Hills Drive to increase the likelihood a certified RSO is present when the gauges are in use by approved, trained users. Said RSO certification training will be conducted by RM Webster within the next thirty (30) calendar days, or by September 3, 2014. This training will be held at the City of St. Peters permitted portable gauge storage facility at 100 Boone Hills Drive.

Concurrent with said RSO training, RM Webster will conduct manufacturer specific portable gauge users and hazmat training, which will meet the requirements stated in Appendix D of NUREG-1556, Vol. 1, Rev. 1, with the designated RSO and any personnel that will be authorized to use the regulated portable gauges. RM Webster is a manufacturer approved Humbolt and CPN brand trainer. Said users training will include training on gauge use, safety, transportation and hazmat documentation requirements.

To ensure NRC permit training compliance, RSO and regulated portable gauge user training will be added to the City's required training database maintained by the City of St. Peters Human Resources Department. The City of St. Peters Human Resources Department provides periodic notification so required training can be scheduled by the individual department. Said compliant RSO certification training will be conducted by a certified RSO trainer every three (3) years and compliant portable gauge use and hazmat transport training will be conducted annually (every 12 months). The content of said RSO and users training, as well as a list of authorized staff that attended each training will be maintained in the City's portable gauge NRC permit file and incorporated in to the City of St. Peters employee training database maintained by the City of St. Peters Human Resources Department.

Measures to Ensure NRC Permit and Portable Gauge Safety Program Compliance:

Upon notification by NRC staff during its June 2, 2014 inspection, use of the regulated portable gauges was prohibited and the gauges properly secured at the City's permitted storage facility at 100 Boone Hills Drive, St. Peters, MO 63376. The City of St. Peters' RSO (Jason Lewis) fully reviewed, updated and brought in to compliance documentation and practices utilizing NRC's *Consolidated Guide About Materials Licenses* (NUREG-1556, Vol. 1, Rev 1). As stated above RSO and portable gauge users training will be conducted within the next thirty (30) days or September 3, 2014. Use of the regulated portable gauges will remain prohibited until this training is complete.

To further ensure ongoing NRC permit compliance, RSO and regulated portable gauge user training will be monitored by the City's designated RSO and added to the City's required training database maintained by the City of St. Peters Human Resources Department. Said compliant RSO certification training will be conducted by a certified RSO trainer every three (3) years and compliant portable gauge use and hazmat transport training will be conducted by a certified trainer for the City of St. Peters specific permitted portable gauges annually (every 12 months). This annual users training will assist the RSO with maintaining the City of St. Peters' Nuclear Safety Program in compliance with its NRC permit.

In addition, the City's designated RSO will schedule and perform an annual audit of City of St. Peters Nuclear Safety Program in compliance with the recommended practices and procedures outlined in said *Consolidated Guide About Materials Licenses*. The findings of said audit will be documented, reviewed by the RSO's supervisor, and placed in the portable gauge permit file. Any

corrective action found needed by said audit will be completed within an appropriate timeframe for the corrective action required, documented by the RSO and filed with the portable gauge permit.

If you have any questions or require further action, please contact me at (636) 477-6600, ext. 1390.

Sincerely,

A handwritten signature in black ink, appearing to read 'W B Benesek', with a stylized flourish at the end.

William B. Benesek, PE
Director of Transportation
City of St. Peters

Cc: Jason Lewis, Civil Engineer, City of St. Peters, RSO

Warren, Geoffrey

From: Burt Benesek <bbenesek@stpetersmo.net>
Sent: Friday, August 01, 2014 2:06 PM
To: Warren, Geoffrey
Cc: Jason Lewis
Subject: RE: Response to Apparent Violations in Inspection Report No. 03018256/2014001 (DNMS) EA-14-106 (Supplemental)
Attachments: Response to Notice of Violation - Report No 03018256-2014001 DNMS EA-14-106 Suppliment.pdf

Mr. Warren,

I apologize. The attachment was not included in the previous email.

<<Response to Notice of Violation - Report No 03018256-2014001 DNMS EA-14-106 Suppliment.pdf>>

William B. Benesek, PE
Director of Transportation
City of St. Peters, Missouri
Office: (636) 477-6600, ext 1390
Mobile: (636) 485-3642

E-mail: bbenesek@stpetersmo.net

From: Burt Benesek
Sent: Friday, August 01, 2014 2:02 PM
To: 'geoffrey.warren@nrc.gov'
Cc: Jason Lewis
Subject: Response to Apparent Violations in Inspection Report No. 03018256/2014001 (DNMS) EA-14-106 (Supplemental)

Mr. Warren,

Please find attached the City of St. Peters' response to the stated apparent violation noted in NRC Routine Inspection Report No. 03018256/2014001 (DNMS) EA-14-106, dated July 1, 2014. Please consider this a supplement to the City of St. Peters July 31, 2014 letter, subject line: *Response to Apparent Violations In Inspection Report No. 03018256/2014001 (DNMS) EA-14-106*. A hard copy will follow.

Please let me know if further action is required.

William B. Benesek, PE
Director of Transportation

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