



GEORGE J. GEISSER, JR., P.E.
GEORGE J. GEISSER, III, P.E.
NORMAN R. PAQUETTE, P.E.
1921-1985

Geisser Engineering Corporation
Consulting Engineers

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August 21, 2014

United States Nuclear Regulatory Commission

Washington, DC 2055-001

Attn: Patricia K. Holahan, PhD, Acting Director

Office of Enforcement

Re: Order Imposing Civil Monetary Penalty

Geisser Engineering Corporation

Dear Ms. Holahan:

We have received notice of payment due for the civil penalty incurred by our company, Geisser Engineering Corporation. We object to the verbiage in the imposing of the penalty that we deliberately utilized the nuclear density gauges in an NRC jurisdiction. We have gone to considerable expense in meeting with your organization as well as reviewing the regulations regarding the use in NRC jurisdictions. These expenses include travel to King of Prussia, writing numerous correspondences and studying the areas where we failed to comply.

During all of the discussions and meetings that we had it was emphatic that we did not do this deliberately in defiance of NRC regulations. Was it ignorance, most likely, since we assumed that with the Rhode Island State license we could operate on the U.S Naval Base in Newport, RI? Once informed of our work on the base and in Connecticut, we immediately ceased operations. It should be noted that at one time in the past we did have a license with NRC, though our satellite office in Vermont. This was known as Vermont Testing, a subsidiary of Geisser Engineering Corporation.

Imposing this \$8,400 penalty is and will be a hardship for our company to overcome, especially requiring a onetime lump sum payment. We would like to offer that we can pay this penalty on a monthly basis of \$1,000.00 per month until payment is made in full. We will issue you a credit card number for this and you can charge the account every month from the credit card account. We would also like to have NRC entertain the possibility that part of the penalty be utilized for the license required by us for use in all NRC jurisdictions.

We trust this meets with your approval and look forward to hearing from you in the immediate future so that we can resolve this issue.

Very truly yours,

Geisser Engineering Corporation

A handwritten signature in dark ink, appearing to read "George J. Geisser, III", is written over the printed name.

George J. Geisser, III, P.E., RLS

President