

## **GEO-ENGINEERING & TESTING, INC.**

*Geotechnical and Material Testing Engineers*  
Post Office Box 8170 Tamuning, Guam 96931

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January 27, 2017

Mr. Kriss Kennedy  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511

*Subject : License number 56-18173-02 – Troxler Gauge Serial No. 8117*

Dear Mr. Kennedy:

This is to inform you that our subject Troxler nuclear moisture/density test gauge Model 3411-B Serial No. 8117 that we purchased from Troxler Electronic Laboratory on July 28, 1981 was no longer in our possession since latter part of 1998 or 1999, even though it was listed in our inventory to this date.

After we purchased the subject gauge on July 27, 1981 (see Attachment 1 for source material, type and quantity), it was subsequently assigned to Geotesting, Inc., our sister company on Saipan, U. S. Commonwealth of the Northern Mariana Islands. At that time, Geotesting was under the local management of our Engineer [REDACTED] with about 5 or 6 employees included 2 field testing technicians.

Sometime during 1997 to early 1998, the subject Troxler gauge was damaged by a construction loader, but only limited to the outside casing and was no longer usable. Mr. [REDACTED] was trying to find someone locally who could restore the casing so that the gauge could be used again but was not successful; and the gauge could not be shipped back to the factory Troxler because no carrier air or sea would accept the gauge for shipment.

Subsequently, [REDACTED] decided to encase the subject gauge in concrete and gave it to someone on Saipan who brought the gauge to the Philippines. Unfortunately, all these were not properly documented and [REDACTED] eventually left Geotesting to the U.S. Mainland that we understood was somewhere in Southern California, but he never gave us his physical address or telephone contact number in California. About seven years ago, [REDACTED]'s wife Mrs. [REDACTED] called me unexpectedly, and informed me that [REDACTED] had brain problem and was seeking disability welfare

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US NRC Region IV  
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support, and he had speech problem; at that time they were residing in Long Beach, CA. Since then there was no further communication from [REDACTED] or [REDACTED]

We sincerely apologize and regret that we did not inform NRC in due time concerning the subject Troxler gauge, and even inadvertently carried the gauge in our inventory list after it was transferred to a third party apparently taken the gauge outside of the U. S. Territory (Saipan). However, the last leak test conducted on the subject gauge on July 22, 1998 showed that there was no leak from the gauge (see Attachment 2). None of our employees on Saipan at that time included [REDACTED] showed any contamination in their dosimetry test reports.

Since then, all our nuclear moisture/density test gauges are fully accounted for, and physically stored in concrete storage housing. Every gauge is accounted for daily returning to our laboratory after their uses. Leak tests have been conducted on time, gauge inventory has been done every six months. All our technicians using the gauges have been instructed to conduct themselves safely regarding uses of the gauges at the job sites.

We will prepare whatever documents needed to close this issue and are willing to pay penalties related to this issue.

Very truly yours,

GEO-ENGINEERING & TESTING, INC.



Ukrit Siriprusanan, PE  
President / Principal Engineer  
Nuclear Safety Officer

Attachment 1 – Troxler's Radioactive Source Certificate for Model 3411-B Serial 8117  
Attachment 2 – Radiation Detection Co. Leak Test Report number 107 for Serial 8117

# RADIOACTIVE SOURCE CERTIFICATE

Code	<u>47</u>	Customer Number	<u>G2308GUAS</u>
Source Number	<u>CAA-4458</u>	Code	<u>40</u>
Type	<u>Am-241:Be</u>	Source Number	<u>CC-5346</u>
Type of Radiation	<u>Gamma/Neutron</u>	Type	<u>Cs-137</u>
Activity	<u>40 mCi</u>	Type of Radiation	<u>Gamma</u>
Neutron Output	<u>6.6 X 10**4</u>	Activity	<u>7.3 mCi</u>
		Neutron Output	

Sources are encapsulated in stainless steel, Special Form Type A containers

<u>8/21/80</u>	DATE OF MEASUREMENT	<u>2/13/81</u>
WIPE TEST RECORD	Less than .005 micro-curies	WIPE TEST RECORD
<u>7/27/81</u>	removable contamination.	<u>7/27/81</u>

## COMPETENT AUTHORITY

Special Form Certificate

## ORIGINAL USE

Enclosed in Model 3411-B, Serial No. 8117

Date Shipped 7/27/81  
 To GEO-ENGINEERING & TESTING  
P. O. Box 3597  
Agana, Guam 96190

Customer P. O. No. \_\_\_\_\_, License No. 50-18173-0  
 W. O. No. \_\_\_\_\_

## RECOMMENDATIONS

1. Treat radioactive source with respect.
2. Do not touch with hands or body. Use tongs.
3. Do not expose to personnel.
4. Wipe test every six months.
5. If dropped, or struck, immediately wipe test.
6. Consult your Radiological Safety Officer on shipping, handling and surveillance procedures.
7. If questions arise contact Troxler Electronic Laboratories, Inc.
8. Wipe Test Kits available.

## CLASSIFICATION OF RADIOACTIVE SOURCE

According to regulations of the Department of Transportation, this source is Special Form. Whenever shipped by public carrier, a special shipping label is required.

*Martin W. Byrd*  
 RADIOLOGICAL SAFETY OFFICER



P. O. BOX 12057 RESEARCH TRIANGLE PARK, N.C. 27709 USA

Manufacturers of Surface Moisture, Surface Density, Depth Moisture, and Depth Density Equipment

ATTACHMENT 1



# RADIATION DETECTION COMPANY

162 Wolfe Road • P.O. Box 3414 • Sunnyvale, California 94088-3414  
Ph: (408) 735-8700 Fax: (408) 735-0126 www.RadiationDetection.com

## Radioactive Sample Analysis

Report Number 107

MADE FOR: GEO-ENGINEERING & TESTING INC  
ATTN LEOPOLDO S J FABIAN  
PO BOX 8170  
TAMUNING GUAM 96931

PAGE: 1 of 2  
PURCHASE ORDER #:  
ACCOUNT #: 11153-00

The following samples submitted to Radiation Detection Company for analysis were collected from May 29, 1998 through June 17, 1998.

RDC NO.	ISOTOPE	ACTIVITY	MODEL	SERIAL NO.	NANOCURIES*	
					ALPHA	BETA-GAMMA
179014	Am-241		3411-B	8117 LABEL	<0.001	
	Cs-137					<0.01
179015	Am-241		3411-B	8117 ROD	<0.001	
	Cs-137					<0.01
179016	Am-241		3411-B	6639 LABEL	<0.001	
	Cs-137					<0.01
179017	Am-241		3411-B	6639 ROD	<0.001	
	Cs-137					<0.01
179018	Am-241		3411-B	21754 LABEL	<0.001	
	Cs-137					<0.01
179019	Am-241		3411-B	21754 ROD	<0.001	
	Cs-137					<0.01
179020	Am-241		3411-B	5641 LABEL	<0.001	
	Cs-137					<0.01
179021	Am-241		3411-B	5641 ROD	<0.001	
	Cs-137					<0.01
179022	Am-241		3411-B	5576 LABEL	<0.001	
	Cs-137					<0.01
179023	Am-241		3411-B	5576 ROD	<0.001	
	Cs-137					<0.01

None of the above sources are considered to be leaking.

\* The presence of less than 5 nanocuries (0.005 microcuries) of removable contamination from leak tests is acceptable to the Department of Health Services, State of California and the NRC.

SERVICE IS OUR PRODUCT

\* Film and Thermoluminescent Dosimetry

• Instrument Calibrations • Radiation Surveys • Health Physics Consultation • Environmental Analyses •

ATTACHMENT 2