

## **RIIIDNMS\_ADMIN Resource**

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**From:** Rachel Nesmeyer <rnesmeyer@capitalmaterialsco.com>  
**Sent:** Friday, August 24, 2018 11:28 AM  
**To:** Draper, Jason  
**Cc:** Joe Davis  
**Subject:** [External\_Sender] Clarification regarding response to Notice of Violation

Jason,

In addition to our response letter, here is a more detailed reply on the points you asked for.

- A. This violation occurred because, the technicians were not aware that while a gauge is not under direct surveillance of an authorized user, the gauge must be locked with 2 physical barriers to prevent unauthorized or accidental removal of the sealed source from its shielded position. This is to ensure security of the gauge. They were also unaware that if there is not 2 physical barriers, the gauge door itself must be locked to ensure safety. To correct the violation, we have retrained all authorized users on both security and safety protocols. Additionally, we have implemented an internal auditing program to be carried out quarterly to further ensure compliance. Full corrective actions were implemented on April 20<sup>th</sup>, 2018.
- E. This violation occurred because, the licensee was unaware of the requirements. To correct the violation, a Radiation Safety Program Audit was created and will be implemented quarterly at random. This implementation of location audits began May 11th. On a quarterly basis I am reviewing these findings with Capital Management. If any violations are identified, I am notifying management immediately and taking required corrective actions. This process was implemented on April 25<sup>th</sup>, 2018. Additionally we created an annual program audit that addresses the criteria of NUREG 1556 V. 1. implemented as of August 23rd, 2018.