



Engineering and Surveying Inc.

1091 Stoneridge Drive • Bozeman, Montana • Phone (406) 587-1115 • Fax (406) 587-9768
www.chengineers.com • E-Mail: info@chengineers.com

September 18, 2019

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Re: Reply to Notice of Violation – C&H Engineering and Surveying, Inc, License No.: 25-35009-01, Docket No.: 030-38578

Dear Sir or Madam,

On June 10-11, 2019 the NRC completed a routine, unannounced inspection at our office. During the inspection they determined that there were a total of two Security Level IV violations of the NRC requirements. Please find this letter as a written response addressing the noted violations.

The first violation was that an authorized nuclear density gauge user transported one of our nuclear density gauges without shipping papers prepared in Accordance with 49 CFR Part 172.

It was our practice to have a binder with shipping papers located in the vehicles that were used for transporting the nuclear density gauges. Over the past year or so we have been updating our fleet of vehicles and the binders did not get transferred to the new vehicles.

As of notice of the violation, C&H Engineering has prepared shipping papers in accordance with 49 CFR Part 172 and has placed them within all of our vehicles that may potentially be used to transport our nuclear density gauges. All nuclear density gauge users have been trained to now verify that the shipping papers are in the transport vehicle before transporting a nuclear density gauge. As of the writing of this letter, full compliance has been achieved in regards to this violation.

The second violation was that an authorized nuclear density gauge user had not received Hazmat training within a three-year time period.

Rick Cooper in our office transported a nuclear density gauge without having the proper hazmat refresher training. As the radiation safety officer, I take responsibility for not verifying that all nuclear density gauge users have the appropriate training. In order to prevent this from happening in the future I am going to begin adding a section to the annual audit that lists each nuclear gauge density user and the date of their most recent hazmat training. This will alert us to who needs the required hazmat training each upcoming year.

Civil/Structural Engineering and Surveying

IEDT
RGN-IV

Since notification of the violation, Rick Cooper has since completed the required hazmat training. It has also been verified that all of our other nuclear density gauge operators have received the required training. As of the writing of this letter, full compliance has been achieved in regards to this violation.

If you have any questions or need further information, please contact the undersigned.

Sincerely

A handwritten signature in black ink, appearing to read "M.J. Welch", written in a cursive style.

Michael J. Welch, P.E.
Radiation Safety Officer