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June 24, 1985

REGION VISE

R.A. Scarano, Director  
Division of Radiological Safety and Safeguards Program  
Nuclear Regulatory Commission  
1450 Maria Lane Suite 210  
Walnut Creek, California 94596

Dear Mr. Scarano:

In reply to your May 28, 1985 letter concerning the inspection conducted by Mr. David A. Skov we are providing the following information as relates to the findings:

- A. An amendment to our Materials License has been requested to change the name of the radiation safety officer and the users of the gauge. This amendment request was forwarded to your Washington, D.C. office in accordance with instructions. *YMR*
- B. A physical inventory of all sealed sources received and possessed under the license has been conducted and documented.
- B. A leak test has been conducted on the nuclear gauge and submitted to the United States Testing Laboratory in Hanford, Washington for analysis.
- D. Records of personnel monitoring were available at the time of the inspection but not filed in a location where Mr. Shay or Mr. BBarber could locate them. These records have been placed in a comprehensive file for all nuclear density gauge information.
- E. The documents required under 10 CFR 19.11(b) have been posted at the storage location of the gauge at Cook Creek, Washington. In addition this information has been posted at the Hoquiam office and will be posted at any project office sites.
- F. Form NRC-3 has been posted at the Cook Creek, Washington Storage site and the Hoquiam Office.

The seriousness of the findings is recognized and in order to prevent future violations, several actions have been taken to establish a more effective management control of the radiation safety program. There has been a complete turn over of the engineering staff with the Branch of Roads. This is not used as an excuse, but does explain the lack of continuity in the monitoring program. Among the actions taken and controls established

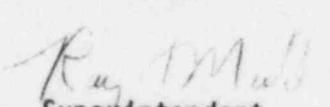
are the following:

- A. The findings of the inspection as well as all conditions and requirements of the license have been discussed by the Branch of Roads Staff.
- B. All material concerning the Nuclear Gauge and Nuclear Regulatory Commission requirements has been systematically filed for ready reference.
- C. Other agencies with individuals more experienced in the use of the nuclear gauge and compliance with NRC regulations have been contacted and their advice and recommendations taken into consideration in establishing our own management controls.
- D. An experienced highway engineer has been assigned the responsibility of being the radiation control officer and all employees have been appraised of the requirements.
- E. The radiation control officer will maintain a list of requirements with appropriate dates for follow ups and insure that all requirements are adhered to within the appropriate time frames.
- F. The Agency Superintendent will on an annual basis assure that the Branch is properly monitoring the radiation program, that all regulatory requirements are being met, and in particular, that all required tests and personnel monitoring are being conducted on schedule.
- G. All Branch employees will be provided with a copy of the license with instructions to become totally familiar with the conditions.

We believe that the controls which we are putting in place will prevent any future failure to comply with regulations or to overlook any time frame requirements for monitoring or accomplishing tests.

If the Nuclear Regulatory Commission has further requirements or recommendations they will be immediately incorporated into our management and control program.

Sincerely,

  
Superintendent

cc:  
Subj.  
Chrono  
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GMRice:gk 06/24/85