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570 Beatty Rd. • Pittsburgh,  
Monroeville, Pa. 15146  
412-856-6400

May 29, 1985

Docket No. 030-06199  
License No. 37-09180-01

U. S. Nuclear Regulatory Commission  
Region 1  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Dr. John D. Kinneman, Chief  
Nuclear Materials Safety Section A,  
Division of Radiation Safety & Safeguards

Inspection Report  
No. 37-09180-01

Gentlemen:

This is in response to your letter received early in May outlining, in Appendix A, the violations identified during the inspection of our facilities on February 15, 1985, by Mrs. Teresa Hall Darden. Our corrective action procedures for both violations, concerning leak testing and inventories as described in A and B of Appendix A (attached), are essentially the same. They are as follows:

1. Both violations occurred during 1983. Since that time a new Radiation Protection Officer has been appointed. Additionally, secondary responsibility has been assigned to another person. This dual responsibility establishes an additional check on such items as leak testing and inventories. A formal schedule for such leak testing and inventories has also been established and documented. Inventories are also conducted on a weekly or biweekly basis for accounting purposes in addition to the required inventory every six months.

Use of the systems as described has already resulted in strict compliance with the required schedules for leak testing and inventories. This was found by Mrs. Darden during her inspection visit in the documentation for our presently owned seven Troxler surface moisture-density gauges for the more recent time periods.

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2. Based on the results achieved during the more recent time periods with the newly established procedures, the corrective steps described in (1) above, when applied rigidly, will avoid further violations.
3. Full compliance is presently being achieved and will continue to be achieved in the future.

Very truly yours,  
GAI Consultants, Inc.

*C.T. Ford*

Charles T. Ford  
Radiation Protection Officer

CTF/dae

Enclosure