



# CIVIL ENGINEERING ASSOCIATES, INC.

SHELBURNE, VERMONT 05482

802 985-2323

CHARLES R. DUNHAM  
President

JEAN CAROL DUNHAM  
Treasurer

October 2, 1985

U.S. Nuclear Regulatory Commission, Region I  
Nuclear Material Safety Section B  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Attention: Dr. John E. Glenn

Subject: Docket No. 030-17589  
Inspection Report No. 030-17589/85-01

Dear Dr. Glenn:

In accordance with your directives presented in a letter dated September 4, 1985, we are responding to those violations of License No. 44-19424-01 listed in Appendix A of that letter.

Violation A. Unauthorized personnel using the gauges.

1. Corrective action - use of the gauges is now only permitted under supervision by or in the presence of Charles R. Dunham or James P. Olson.
2. Corrective steps for future - two additional staff members are scheduled for radiation safety training and gauge operation training by Troxler Electronics. The addition of two additional qualified staff will increase our flexibility in providing supervision of other staff in the field.
3. The anticipated date of additional staff certification will be subsequent to the training session scheduled for October 23, 1985.

Violation B. Storage location of gauges and licensed materials.

1. The change in storage location was as a result of a change in Company location and the new storage facility is at our new location on Falls Road, Shelburne, Vermont in the laboratory building of the Shelburne Falls Professional Building.
2. No future changes are anticipated since the Company has purchased the present building.
3. A new location map was submitted with our license renewal application dated May 21, 1985.

8511010150 851028  
REG1 LIC30  
44-19424-01 PDR

STUDIES • DESIGN • INSPECTION • TESTING

SURVEYING & LAND DEVELOPMENT

HYDRAULICS & HYDROLOGY

SANITARY & WATER

FOUNDATIONS & STRUCTURES

CONCRETE & SOIL TESTING

Violation C. Failure to complete physical inventory on 6 month schedule.

1. Physical inventory was completed on June 28, 1985 and our two sealed sources were accounted for.
2. Laboratory personnel and the RSO have established a routine schedule for inventory to occur on (or about) June 30th and December 30th of each year.
3. Policy and schedule are presently in place.

Violation D. Failure to complete leak test on a 6 month schedule.

1. Leak tests were completed for both sealed sources on June 28, 1985 and copies of Certificates are attached.
2. A leak test policy and schedule have been established to coincide with the 6 month physical inventory.
3. Policy and schedule are presently in place.

Violation E. Restraint and protection during transportation.

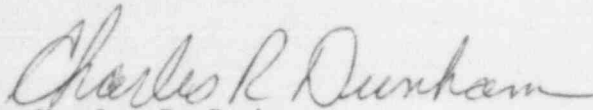
1. Transportation is currently limited to vehicles having a separate, locking trunk compartment which restrains the gauge and shipping case from movement and is hidden from view.
2. Two additional vehicles will be equipped with tie downs and metal clamps. One vehicle is a pick-up truck with an aluminum cap (lockable) and the other is a Volkswagon Rabbit sedan. Canvas covers and expandable straps will be used to hide the gauge from view in these vehicles.
3. Scheduled retrofitting of these vehicles is to be completed by November 15, 1985.

We are obviously aware that our procedures and supervision have been lacking. Those violations cited by Mr. Oberg as a result of his inspection visit are well-founded and demonstrated that we have not been conscientious in meeting our licensing requirements. It is our hope that those steps we have outlined above are an indication that we recognize our deficiencies and have taken the proper steps to ensure present and future compliance.

We submit this response in good faith and with an indication that we are committed to the necessary improvements in our record keeping and our supervision of the authorized use of the gauges in our possession.

If we have omitted any details or can provide you with additional information, please call us or write us at your earliest convenience.

Very truly yours,

A handwritten signature in cursive script, reading "Charles R. Dunham". The signature is written in dark ink and is positioned above the printed name and title.

Charles R. Dunham  
President

CRD/jcd  
Enclosures



10 South Buchanan Circle  
Irvine, California USA 94553  
Telephone (415) 687-6472  
Telex 17-1289 CPN-UD

**CERTIFICATE OF LEAK TEST**  
(LTK-1)

**RECEIVED**

JUL 30 1985

Civil Engineering Associates, Inc.

*JPO/son*

**CUSTOMER**

**James P. Olson**  
Civil Engineering Assoc.  
P.O. Box 485, Falls Road  
Shelburne, VT 05482

*This is to certify that the leak test on the indicated source has been counted on the specified date and the results shown accurately represent the level of removable contamination.*

**SERIAL NO. OF SOURCE** M10083398  
**ISOTOPE** CS-137/AM-241 **QUANTITY** 10/50 MCI.  
**REMARKS** CIVIL ENGR ASSOC.  
**MANUFACTURER**  
**DATE OF TEST** 6-28-85

**RESULTS**

**GROSS COUNTS** 210.  
**BACKGROUND COUNTS** 210.  
**EFFICIENCY** 51.0% **DPM** 0.00E+00  
**REMOVABLE CONTAMINATION** 0.00E+00 MICROCURIES

(NOTE: Removable contamination equal to or greater than 5.0E-3 microcuries (11,000 dpm) constitutes a leaking source.)

**COUNTED BY** G. STOKLEY  
**DATE** 7-12-85

**APPROVED BY**  
**TITLE** Radiation Protection Officer

*C. P. Hyatt*



10 South Buchanan Circle  
Irvine, California USA 94553  
Telephone (415) 687-8472  
Telex 17-1289 CPN-UD

**CERTIFICATE OF LEAK TEST**  
(LTK-1)

**RECEIVED**

JUL 30 1985

Civil Engineering Associates, Inc.

*J.P.O./son*

**CUSTOMER**

James P. Olson  
Civil Engineering Assoc.  
P.O. Box 485, Falls Road  
Shelburne, VT 05482

*This is to certify that the leak test on the indicated source has been counted on the specified date and the results shown accurately represent the level of removable contamination.*

SERIAL NO. OF SOURCE M14125849  
ISOTOPE CS-137/AM-241 QUANTITY 10/50 MCI.  
REMARKS ASCOR  
MANUFACTURER  
DATE OF TEST 6-28-85

**RESULTS**

GROSS COUNTS 210.  
BACKGROUND COUNTS 210.  
EFFICIENCY 51.0% DPM 0.00E+00

REMOVABLE CONTAMINATION 0.00E+00 MICROCURIES

(NOTE: Removable contamination equal to or greater than 5.0E-3 microcuries (11,000 dpm) constitutes a leaking source.)

COUNTED BY Q. STOKLEY  
DATE 7-12-85

APPROVED BY *C.P. Hysmith*  
TITLE Radiation Protection Officer