

DCD

Wilcox Associates



Engineering
Surveying and
Environmental
Sciences

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August 13, 1996

United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

RE: Response to Apparent Violations in Inspection Report No. 030-20901/96001 (DNMS)

Wilcox Associates, Inc. (WAI) would like to take this opportunity to respond to the apparent violations addressed in the referenced inspection report.

The four violations listed are as follows:

1. Failure to maintain control over a moisture / density gauge containing licensed material that was subsequently damaged by a vehicle.
2. Failure to determine that the truck that ran over the gauge was not contaminated by the event.
3. Failure to perform audits of licensed activity for 1995.
4. Failure to perform a leak test within the required 6 month interval.

The "accident" listed in violation #1 was not construed as an "incident" by the Troxler personnel contacted at the time or by the Wilcox Associates, Inc. interpretation of the NRC guidelines due to the obvious fact that no damage was sustained to the interior integrity of the gauge. However, careless behavior of this type cannot be tolerated within WAI for obvious reasons, and the individual's position was terminated following the accident. Four Assistant Radiation Safety Officers (RSO's) attended Troxler's certification course in the Spring of 1996 and a training program was implemented to aid in preventing similar situations with potential for violations in the future. WAI believes that we are currently acting in full compliance with license requirements and would appreciate any advice to perfect our procedures as we endeavor to maintain an accident-free workplace.

The situation listed in violation #2 was visually inspected on the site at the time of the accident. It was obvious to all individuals that the damage did not penetrate beyond the exterior plastic casing of the gauge. Upon explanation of the extent of damage to Troxler personnel, WAI was advised that this accident was not characterized as an "incident". In an effort to be better prepared for an actual "incident", Wilcox Associates has revised its Emergency Response Program to include a specific Emergency Response Team. That Emergency Response Team is comprised of

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Environmental Safety and Health (ESH). Within their various facilities, the range of service required will be provided to our main office and each of our satellite offices. ESH is equipped with radiation detection meters, leak test kits, and all other items recommended as necessary in an emergency response kit. This program will prevent the possibility of further violations from this date forward.

The violation listed as #3 resulted from an internal delinquency in record keeping. We admit a mistake in this matter and will improve our processes in regard to the relatively new requirement of retaining documentation of annual audits for a minimum of three (3) years. Annual meetings of inspection operating procedures, including dosimeter badge exposure and usage, are currently held by Wilcox Associates. WAI will incorporate into our meetings, written documentation of annual audits, to complete our records. The addition of annual audit documentation places our facility in current compliance.

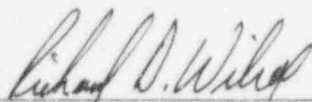
The violation listed as #4 involved an extended period between leak tests for a specific gauge. WAI recognizes leak tests as a very important item in the handling of radioactive material. At the request of the auditing personnel, extensive leak test histories of each gauge were provided to the NRC. The fact that a greater than six (6) month period elapsed between leak tests for one gauge was due to the gauge having been used very little throughout the referenced period. A subsequent oversight resulted in performing the leak test on that gauge. WAI will continue our leak test procedures and the RSO will make it a point to check off each listed gauge at the time of leak testing. WAI is currently in compliance with the requirements of leak test frequencies.

Wilcox Associates, Inc. would like to apologize for taking such a large portion of your time due to our mis-interpretation of NRC guidelines and lapse in our record-keeping process.

WAI does not take the information discussed during this audit lightly and will endeavor to improve all of our operating procedures as a result of the items which have been brought to our attention.

Sincerely,

WILCOX ASSOCIATES, INC.



Richard D. Wilcox, P.E., P.S.
Radiation Safety Officer