



14221-B WILLARD ROAD
SUITE 100
CHANTILLY, VA 20151
(703) 803-6411
FAX: (703) 803-8085

August 21, 1996

U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street N.W., Suite 2900
Atlanta, Georgia 30323-0199

Attention: Regional Administrator

Reference: Reply to a Notice of Violation

Dear Sirs:

In response to your notice of violation and inspection report #45-23031-01/96-01 we offer the following.

1. 49CFR177.842 - Our technician felt that nuclear gauge was sufficiently braced. Technician has been instructed that nuclear gauge must be blocked and braced to prevent change of position during transport.
2. 49CFR172.202 - CTI was not aware that our bill of lading was inadequate. A new bill of lading has been provided and is now in use (See Attached).
3. 10CFR20.1101 - CTI did not have a formal annual audit procedure. We have now scheduled a formal audit for 8-22-96 and will document our findings and take corrective measures where needed.
4. License Condition 14.A - After our first violation for leak tests CTI enacted a calendar reminder system for leak tests. We found this system to be inadequate. In 1994, CTI began placing our leak test reminder sheets in our office "Tickle" file. This file is set up with months of the year and days of the month and is checked weekly. We have found this "Tickle" file to be effective and have performed all required leak tests since September, 1994.

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PDR ADDCK 03020195
C PDR



CONSULTANTS, INC.

U.S. Nuclear Regulatory Commission Region II
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We trust our response will meet with your approval. If you have any questions or suggestions please do not hesitate to call.

Sincerely,

Cliff Thomas
Vice President/Radiation Safety Officer

CT/mc

cc: NRC File
USNRC, Attn: Document Control Desk
CS/DH

CTI Consultants, Inc.
BILL OF LADING FOR NUCLEAR MATERIALS

SHIPPED BY: CTI Consultants vehicle or employee vehicle

BILL OF LADING DATE:

DRIVER:

MOISTURE STANDARD:

FROM: CTI Consultants, Inc.
14221-B Willard Road
Suite 100

DENSITY STANDARD:

EMERGENCY PHONE NO. 6:00 a.m.-6:00 p.m., MON.-FRI.
703-803-6411 - CLIFF THOMAS OR ROB LIBERATORE

24-HOUR EMERGENCY PHONE NO. 919-839-2676

TO: Listed construction sites and return to above storage area

JOB NO.

JOB NAME AND LOCATION

RQ, RADIOACTIVE MATERIAL, SPECIAL FORM, NOS, UN2974, CLASS 7, TYPE "A" PACKAGE, CONTAINING: TI=0.5

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation

ITEM BEING TRANSPORTED: Nuclear Moisture Density Gauge: Type A Nuclear Materials.
Sealed Source: Cs137 Nte. 10 mCi, Am241/Be, Nte. 50 ci.

(Circle Appropriate Gauge Information)

CTI NO.:	2	3	4	5	6	7	8	9	10	12
MANUFACTURER:	Maryland	CPN	CPN	CPN	CPN	CPN	CPN	CPN	CPN	CPN
MODEL NO.:	3411-B	MC-1	MC-1	MC-3	MC-1	MC-1	MC-1	MC-1	MC-1	MC-1
SERIAL NO.:	12089	M16056743	M16117211	M36127282	M18038166	M18128644	M18128641	M17057598	M17071976	M17057597

CTI NO.:	14	15
MANUFACTURER:	Troxler	Troxler
MODEL NO.:	3430	3430
SERIAL NO.	23524	23525

INSTRUCTIONS: This form is to be completed prior to leaving the lab and carried within reach of the driver at all times during transportation. If field instructions change and additional jobsites are visited, they must be added to this form prior to leaving the listed site. This form is to be turned in to the equipment manager when the gauge is signed back in at the storage area.