

CONSTRUCTION TESTING & ENGINEERING, INC.

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February 25, 1997

UNITED STATES NUCLEAR
REGULATORY COMMISSION

ATT.: Document Control Desk

Washington, DC 20555

SUBJECT: Reply to Notice of Violation
Docket No: 150-800004
License No. CA 5309-80

To Whom It May Concern:

The following is Construction Testing and Engineering's response to the noted violations during an NRC Inspection conducted on December 11, 1996.

The violation noted consists of, as CTE understands it, the requirement to provide Hazmat Training to all employees who transport licensed material on public highways or who deliver licensed material in accordance with 49CFR 172.

1. Reason for the Violation.

Our response to the violation is that CTE was not in compliance with the requirements and were unaware of the extensive Hazmat training that was required for CTE personnel. All CTE personnel who have transported licensed material have taken an 8-hour course on nuclear gauge safety which included safety instruction, labeling and notification requirements when transporting the licensed materials.

2./3. Corrective Steps That Have Been Taken.

Upon notification of the violation CTE's Radiation Safety Officer researched the requirements and based on his review the following is required to comply with 49CFR172:

Each Hazmat Employer must:

- Train and test;
- Certify; and
- Develop and retain records of current training for each Hazmat employee.

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Hazmat Training must include:

- General Awareness/Familiarization
- Function specific
- Safety
- Driver Training

Frequency of Training:

- Initial training must be completed within 90 days.
- Retraining every two years.

To fulfill the requirements as set forth above, CTE has ordered and obtained a copy of "Awareness for Initial Response to Hazardous Materials" from the Department of Transportation. These materials will satisfy the general awareness/familiarization requirements. To fulfill the remainder of the requirements, the Radiation Safety Officer, (Mr. Ramzi Jamma) will attend a Department of Transportation course "Instruction Training Hazardous Materials Transportation". The next course is scheduled for May 20-22, 1997. At the completion of the course Mr. Jamma will be given the DOT Hazardous Materials Transportation Training Modules. These modules will be used by Mr. Jamma to train all other employees.

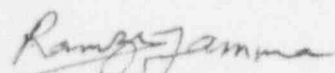
4. Required Period to Bring Firm into Compliance.

CTE will begin training immediately by requiring all affected employees to view DOT's "Awareness for Initial Response to Hazardous Materials" and will conduct training to fulfill the function specific, safety and driver training requirements. Each employee will be tested and certified within a period of 60 days.

In addition, upon Mr. Jamma's completion of the DOT training in May all affected employees will be required to view and be tested on the DOT Hazardous Materials Transportation Training Modules. It is expected that this additional training will be completed 30 days after completion of the course.

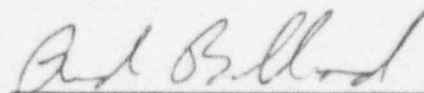
Respectfully submitted,

CONSTRUCTION TESTING & ENGINEERING, INC.



Ramzi Jamma
Radiation Safety Officer

Acknowledged by:



Rod Ballard
Vice President

U.S. Nuclear Regulatory Commission
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cc: Regional Administration Region IV
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