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April 1, 1997

US Nuclear Regulatory Commission,
Washington, D.C. 20555

ATTN: Document Control Desk

SUBJECT: Reply to Notice of Violation
NRC Inspection Report No. 52-24834-01/97-01

Sirs:

We hereby respond to the Notice of Violation dated March 7, 1997 based on the NRC inspection conducted by Mr. John Potter on February 27, 1997.

A. License Condition No.14(a)(1)

1. During the years 1991 through 1994, Ms. Lydia J. Fargas was our Radiation Safety Officer (RSO). As the appointed RSO she kept and prepared our Radiation Safety Program for our Nuclear Material License (No. 52-24834-01). Ms. Fargas left the company in 1994. Apparently, the leak test records for the years 1992 and 1993 have been misplaced and/or lost. Our company has tried to contact Ms. Fargas in order to find out where she placed these records, but she is currently out of the island. We are now implementing a system in which copies of all leak test records for each gauge will be kept at the main office and at each job site where the gauge is being used. This will definitely avoid any future misplacement of these records. We are including copies of the Certificates of leak tests for 1996, which we received on March 15, 1997. In order to avoid any future delays in performing the leak tests, we will implement a system in which all gauges will have a posted expiration date of its last leak test. Thus, if the expiration date reached, the gauge will be put out of service until leak test results are available.

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U.S. Nuclear Regulatory Commission
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B. License Condition No. 16

1. Physical inventories on our sealed sources were previously performed by our Project Supervisors. Since these inventories were not performed by our RSO, records were kept at the job sites, not at the main office. Thus, most records were only kept for the duration of the project. In order to avoid any possible future violations, it has been explained to our Radiation Safety Officer and to all our Project Supervisors that these records must be maintained for at least two years from the date of each inventory. Also, a copy of all physical inventories for each gauge will be kept in our the main office for future NRC inspections.

We consider that with the above mentioned corrective measures, we are now in full compliance with the Nuclear regulatory Commission's requirements.

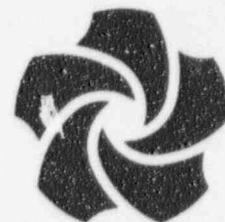
Sincerely,

REDONDO CONSTRUCTION CORPORATION

Raúl Bras Cummings
Vice-President

cc: Regional Administrator, Region II

Boart Longyear Company
2830 Howe Road
Martinez, California 94553 USA
Telephone: (510) 228-9770
Fax: (510) 228-3183



**BOART LONGYEAR
CPN**

CERTIFICATE OF LEAK TEST

REDONDO CONSTRUCTION CORP
ATTN: ROLANDO MAYNULET
P.O. BOX 364185
SAN JUAN, PR 00936

Customer No: 18110300
Date Sample Collected: 03/11/97
Test Number: 19790

This is to certify that the leak test on the indicated source (s) was counted on 03/21/97 and the results shown accurately represent the level of removable contamination.

Model: MC-1 DR

Serial Number: MD50502620

<u>Source</u>	<u>Activity</u>	* <u>Removable Contamination (in microCuries)</u>
AmBe 241	50 mCi	.0000035
Cs 137	10 mCi	.0000162

* 0.005 microcuries (185 Bq) or greater constitutes a leaking source.

This Source : May Remain in use.

Reviewed by: Leak Testing Quality Control

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ATTN: ROLANDO MAYNULET
P.O. BOX 364185
SAN JUAN, PR 00936

Customer No: 18110300
Date Sample Collected: 03/11/97
Test Number: 19791

This is to certify that the leak test on the indicated source (s) was counted on 03/21/97 and the results shown accurately represent the level of removable contamination.

Model: MC-1 DR

Serial Number: MD41002286

<u>Source</u>	<u>Activity</u>	* <u>Removable Contamination</u> <u>(in microCuries)</u>
AmBe 241	50 mCi	.0000035
Cs 137	10 mCi	.0000121

* 0.005 microcuries (185 Bq) or greater constitutes a leaking source.

This Source : May Remain in use.

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ATTN: ROLANDO MAYNULET
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Customer No: 1811030L
Date Sample Collected: 03/03/97
Test Number: 19765

This is to certify that the leak test on the indicated source (s) was counted on 03/17/97 and the results shown accurately represent the level of removable contamination.

Model: MC-1 DR

Serial Number: MD16046697

<u>Source</u>	<u>Activity</u>	* <u>Removable Contamination</u> <u>(in microCuries)</u>
AmBe 241	50 mCi	.0000032
Cs 137	10 mCi	.0000268

* 0.005 microcuries (185 Bq) or greater constitutes a leaking source.

This Source : May Remain in use.

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Customer No: 18110300
Date Sample Collected: 03/11/97
Test Number: 19789

This is to certify that the leak test on the indicated source (s) was counted on 03/21/97 and the results shown accurately represent the level of removable contamination.

Model: MC-1 DR

Serial Number: MD18078344

<u>Source</u>	<u>Activity</u>	* <u>Removable Contamination</u> <u>(in microCuries)</u>
AmBe 241	50 mCi	.0000035
Cs 137	10 mCi	.0000202

* 0.005 microcuries (185 Bq) or greater constitutes a leaking source.

This Source : May Remain in use.

Reviewed by: Leak Testing Quality Control