



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

511 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8004

April 10, 1997

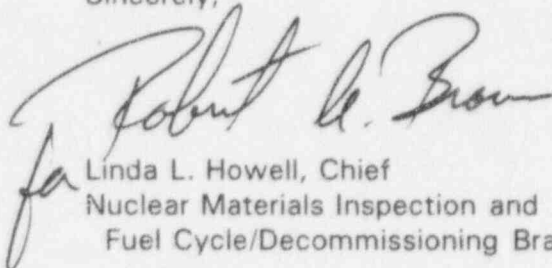
Alan R. Soderling, Radiation Safety Officer
J-U-B Engineers, Inc.
1250 Ironwood Drive, Suite 220
Coeur d'Alene, Idaho 83814

SUBJECT: RESPONSE TO NRC INSPECTION REPORTS 030-32205/97-01 AND NOTICE
OF VIOLATION

Dear Mr. Soderling:

Thank you for your letter of March 27, 1997, in response to our letter and Notice of Violation dated March 18, 1997. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine that full compliance has been achieved and will be maintained.

Sincerely,

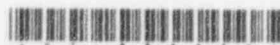


Linda L. Howell, Chief
Nuclear Materials Inspection and
Fuel Cycle/Decommissioning Branch

Docket No.: 030-32205
License No.: 11-28319-01

cc:
Idaho Radiation Control Program Director

9704160174 970410
PDR ADDCK 03032205
C PDR



E-Mail report to Document Control Desk (DOCDESK)

bcc to DCD w/copy of Licensee's Ltr dated 3/27/97: (IE07)

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Regional Administrator

CLCain

DBSpitzberg

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E-Mail report to Document Control Desk (DOCDESK)

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JCruz	JL	LLHowell	PWB						
04/9/97		04/10/97							

OFFICIAL RECORD COPY



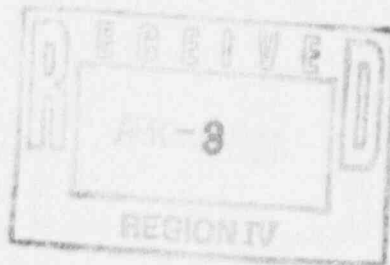
J-U-B ENGINEERS, Inc.
ENGINEERS • SURVEYORS • PLANNERS

1250 Ironwood Drive, Suite 220
Coeur d'Alene, ID 83814

208-667-1574
FAX: 208-667-2176

REPLY TO A NOTICE OF VIOLATION

March 27, 1997



U.S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555

Copy:
Regional Administrator
Region, IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

To whom it may concern:

Re: Docket No. 030-32205, License No. 11-28319-01 - Reply to a Notice of Violation

J-U-B ENGINEERS, Inc. has reviewed our license agreement and the condition found in Twin Falls which resulted in this violation. This review has been conducted to determine:

1. The cause or reason for the violation.
2. The corrective steps to be taken.
3. Steps to avoid future violations.
4. A date for full compliance.

The violation was the result of an unclear understanding of requirements in the licensing agreement, specifically the documents listed in Item No. 19, in our agreement, as enclosures. The Enclosures E through G were written during my responsibility as the RSO and the contents of these letters were clearly included in the body of the license. To my knowledge, no enclosures were ever attached to the license and the contents of Items A through D, were not researched by myself to determine whether they contained any additional criteria to be followed which was not included in the body of our license. The failure to follow through on these documents, resulted in missing the requirement to meet conditions of the CPN Tech Data Sheet #11A, and condition 5 of this document.

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Engineers Surveyors Planners

The following steps have been taken to eliminate this violation. The gauges have been placed in a locked cabinet in our Twin Falls office and the access to these cabinets have been limited to the current approved users. The Regional Manger of our Twin Falls office, along with the RSO will be responsible for controlling access to the keys to be used for this cabinet. Further steps are being taken in an attempt to better understand our requirements under the NRC Licensing Agreement through a complete review of the license and all attachments. This review will be conducted, with the approved users, in a safety meeting. The agenda for this meeting can be seen in the attached memo dated March 27, 1997.

The steps to be taken to mitigate the potential for future violations will be a continuing annual review of the storage facilities. A stronger emphasis will be placed on the ALARA review meeting to help find future deficiencies to our current practices. Problems found in these reviews will be addressed and corrective measures will be implemented.

J-U-B ENGINEERS, Inc. feels that compliance to the violation has already been achieved through providing a lock to the existing cabinets where the gauges are stored. The storage facility will be reviewed for compliance on March 10th, 1997 by the RSO to confirm that the gauges are secure and only accessible to approved users. If any additional steps are required, we should be able to implement these and be in full compliance by the 15th of May, 1997.

This letter will be included in our April 9th & 10th review meeting. If there is any additional item which must be addressed please let us know as soon as possible and we will respond and include this request in our meeting if timing permits.

Sincerely,

J-U-B ENGINEERS, Inc.

Alan R. Soderling, P.E.
Radiation Safety Officer

Enclosures

COPY



J-U-B ENGINEERS, Inc.
Engineers • Surveyors • Planners
1250 Ironwood Drive, Suite 220
Coeur d'Alene, ID 83814
(208) 667-1574
Fax: (208) 667-2176

Date: March 27, 1997

To: Allen Debo, Clint Dyer, Arthur Eisen, Don Haddleton,
Rex Harding, Ellery Howard, Loren Jessup, Mike
Llimakka, Wade Newsom, Craig Soderling, Jim Ward
and Rob Wright

CC: Dale R. Baune, P.E., Regional Manager - Cd'A
Bill Block, P.E., Regional Manager - Twin Falls

From: Alan R. Soderling, P.E., Radiation Safety Officer

Gentlemen, you are on the current list of approved nuclear densitometer users and, therefore, are mandated by me and the Nuclear Regulatory Commission (NRC) to attend an annual Radiation Protection Program in accordance with Title 10 CFR20.1101(c) of the Standards For Protection Against Radiation as published by the NRC.

This meeting will be held in Coeur d'Alene on April 9th at a time set by Wade Newsom. The meeting in Twin Falls will be scheduled for April 10th with the time to be determined by Clint Dyer.

All employees listed above are required to attend. Those who cannot meet this schedule need to make prior arrangements with me or their names will be removed from the users list.

MISSION STATEMENT: To better our abilities in radiation protection principles in order to achieve occupational doses and doses to members of the public, that are "as low as reasonably achievable" (ALARA).

AGENDA:

1. Review the deficiency in the NRC inspection on March 20, 1996.
2. Review the deficiency in the NRC inspection on February 25, 1997.
3. To eliminate these shortfalls now and in the future.
4. To review the current License Agreement with the NRC and our reciprocity agreement in Washington (for Coeur d'Alene office only).
5. To complete an inventory of sources.
6. To go over operation and handling procedures of our gauges.
7. Question and answer period.. All subject matters as it pertains to the license agreement.

We will summarize our meeting and share this with both offices presently using a sealed source. Any questions which were beyond my knowledge will be reviewed with the NRC and addressed in the summary.



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

March 18, 1997



Alan R. Soderling, Radiation Safety Officer
J-U-B Engineers, Inc.
1250 Ironwood Drive, Suite 220
Coeur d'Alene, Idaho 83814

SUBJECT: NRC INSPECTION 030-32205/97-01 AND NOTICE OF VIOLATION

Dear Mr. Soderling:

On February 25, 1997, the NRC conducted an inspection at your Twin Falls, Idaho, facility. The inspection findings were subsequently discussed with you during a telephonic exit briefing on March 11, 1997.

Within the scope of this inspection, one violation was identified. The violation involved the failure to restrict access to the keys to the nuclear gauge storage room. Specifically, the Twin Falls office of J-U-B Engineers, Inc. (JUB), stored portable nuclear gauges and a microwave oven in the same room. In order to allow all personnel access to the microwave oven, the keys to the storage area were accessible to all JUB employees. In an application dated June 27, 1990, JUB committed to restricting the keys to authorized users only. No secondary method of securing the gauges was in place within the storage room.

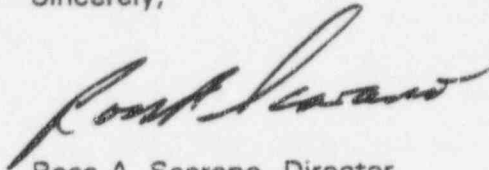
The violation is cited in the enclosed Notice of Violation (Notice). Please note that you are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, NRC Information Notice 96-28, "SUGGESTED GUIDANCE RELATING TO DEVELOPMENT AND IMPLEMENTATION OF CORRECTIVE ACTION," is enclosed. The NRC will use your response, in part, to determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

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Should you have any questions concerning this inspection, please contact Mr. Jeffrey Cruz at (817) 860-8164 or Ms. Linda L. Howell at (817) 860-8213.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ross A. Scarano", written in a cursive style.

Ross A. Scarano, Director
Division of Nuclear Materials Safety

Docket No.: 030-32205
License No.: 11-27319-01

Enclosures:

1. Notice of Violation
030-32205/97-01
2. NRC Information Notice 96-28

cc w/enclosures:
Idaho Radiation Control Program Director

ENCLOSURE 1

NOTICE OF VIOLATION

J-U-B Engineers, Inc.
Coeur d'Alene, Idaho

Docket No.: 030-32205
License No.: 11-27319-01

During an NRC inspection conducted February 25 through March 11, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

- Condition 19 of License 11-27319-01 specifies, in part, that except as specifically provided otherwise in the license, the licensee must conduct its program in accordance with the statements, representations, and procedures contained in an application dated June 27, 1990.

Item 16 of the application date June 27, 1990, specifies that the radiation protection program for the nuclear gauges will be as proposed by the Campbell Pacific Nuclear Corporation Technical Data Sheet 11-A.

Item 5 of the Campbell Pacific Nuclear Corporation Technical Data Sheet 11-A states that gauges will be securely locked in storage areas when not in use. Keys will be restricted to authorized users only.

Contrary to the above, access to the storage area keys were not restricted to authorized users only. Specifically, at the Twin Falls field office of J-U-B Engineers, Inc., all the employees had access to the storage area keys.

This is a Severity Level IV violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, J-U-B Engineers, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region IV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or

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proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at Arlington, Texas
this 18th day of March 1997