



## HIGH STEEL STRUCTURES, INC.

*A Division of High Industries, Inc.*

May 05, 1997

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Clerk

RE: Docket No. 030-12926  
License No. 37-17534-01

This letter is being issued in response to the notice of a violation identified during an NRC inspection conducted on April 15, 1997.

10 CFR 71.5(a) requires that a licensee who transports licensed materials on a public highway, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170 through 189.

49 CFR 177.817(a) requires that a carrier not transport a hazardous material unless it is accompanied by a shipping paper prepared in accordance with 49 CFR 172.200-203.

Specifically, radioactive material was transported without shipping papers prepared in accordance with 49 CFR 172.200-203 across a public highway that transverses our Lancaster, Pennsylvania facility. Prior to this inspection, our practice of traversing a public highway was not viewed as transporting licensed material and thus shipping documents were not prepared.

Following notification of the violation and after verifying that 49 CFR Parts 170 through 189 does not specifically exempt transporting hazardous material across public highways that transverses a facility, we immediately suspended transporting via vehicle our licensed material.

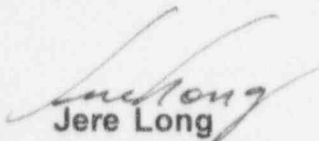
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In the future, if it is deemed desirable to resume transporting our license material in a vehicle, all radiographers transporting licensed material will be trained in the requirements specified in HM126(f). Licensed material to be transported on or across a public highway will be properly packaged, classified, labeled, and shipping papers will be prepared in accordance with 49 CFR 177.817(a).

Sincerely,



Jere Long  
Radiation Safety Officer

Enclosure:  
Notice of Violation

cc w/enclosure:  
Regional Administrator,  
Region 1