



GME

GME TESTING

December 9, 2021

Attn: Mr. David L Pelton, Director of Division of Nuclear Materials and Safety

Subject: Response to the apparent Violations in Inspection Report

No. 03035029/2021001(DMNS); EA-21-134

License No: 13-32182-01

Dear Mr. Pelton

We are responding to your violation letter dated November 2, 2021. During a routine inspection on June 24, 2021, an inspector identified 3 apparent violations of title 10 of the Federal Regulations (CFR) 30.34(c).

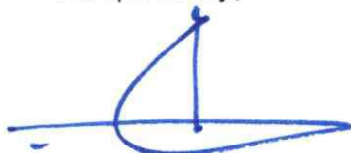
The root cause and corrective actions of these violations were discussed with Jason Draper during the inspection as well as during follow up conversations.

- 1) Failure to confine possession of byproduct material to the locations authorized by our license.
 - a. The Seaman 75C gauge was inadvertently moved to storage during a clean out of our building. It had not been used for years and the new technician that moved it was unaware that it could not be moved out of the storage cabinet that it was stored in.
 - b. The corrective action was to get the gauge leak tested and moved back to our building storage. The leak test was completed on July 16, 2021, and moved back to the building on August 16, 2021, after results were received back.
 - c. We have approved and implemented a new internal procedure where access and movement of gauges is strictly prohibited without prior approval and monitoring of RSO. RSO will monitor the log daily and keep inventory of all gauges on a daily basis regardless of gauge being used or not. A second procedure was also approved and implemented where item cannot be transferred from or to the offsite storage without the supervisor signing a detailed list of items to be moved and then RSO and the VP operations combined written approval. This procedure was introduced as a second measure.
- 2) Failure to secure Seaman gauge from unauthorized removal with a minimum of two independent physical controls.
 - a. The root cause for this violation is also a result of the move to the storage unit.

- b. The corrective action for this violation was taken care right away by securing the gauge with a chain and lock, and the outside lock remained on the unit.
 - c. Every technician was trained again on the barriers needed for nuke gauges. All new locks were purchased for chains and nuke boxes to ensure that there are at least two barriers.
- 3) Failure to limit possession to the maximum amount authorized by conditions 8.A and 8.B of amendment 9
- a. The root cause of this violation was that the former assistant RSO did not understand that the license had changed from the previous one and limits were now based on number of gauges not total mCi's.
 - b. The corrective action was to:
 - a) amend our license which was done immediately and approved on August 11, 2021, to increase our limits.
 - b) Establish a new line item in RSO job description and job responsibilities where license and all other communication should be thoroughly reviewed for discrepancies and all errors should be reported with urgency and corrective action needs to be swiftly implemented.
 - c) Introduced and implemented an internal procedure where VP Operations will conduct periodic internal audits to ensure all procedures are carried out effectively.
 - c. We have asked for a higher limit than what we currently need in order to ensure that we will not go over the maximum allowed. The license will be reviewed each time we are purchasing a nuke to ensure that this will not happen again.
- 4) We successfully sold the Seaman 75C gauge to a third part on November 11, 2021 and copy of bill of lading is attached.

If there are any more questions or additional information is needed, please let me know at your earliest convenience.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Sam Abbasi', with a stylized flourish extending to the left.

Sam Abbasi
Radiation Safety Officer (RSO)

STRAIGHT BILL OF LADING - SHORT FORM - NOT NEGOTIABLE

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Uniform Freight Classification in effect on the date hereof, if this is a rail or rail-water shipment or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

From: Chase Environmental Group, Inc.

Consigned To:

for GME Testing
3517 Focus DriveTOXCO, Inc.
109 Flint Road

Fort Wayne, IN 46818

Oak Ridge, TN 37830

Contact: Brian Church
865-399-5151Contact: Rick Low
865-482-5532

Shipment Number

NA-2021-298

Originating Carrier: SJ Transportation Co., Inc.

Connecting Carrier(s): N/A

Delivering Carrier: Same

Tractor #: 3004

Trailer #: N/A

DATE: 11/11/2021

Number of Packages	HM	Description	Weight (kg)
NA-TS-X-21-337 One Drum		UN2915 Radioactive material, Type A package, 7 Ra-226, Solid/Oxide; 1.67E+02 MBq Radioactive label = <i>yellow III</i> , TI = <i>1.5</i> <i>case</i> One <i>drum</i> with gauge for transship and storage <i>11-11-21</i>	<i>50</i>
Emergency Response Telephone Number: Chemtrec @ 800-424-9300 (Customer #:4395)			
Emergency Response Guide References: US DOT # 163			

CONSIGNOR (SHIPPER):

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

ARRIVED AT SHIPPER:	DATE	TIME	VEHICLE RELEASED:	DATE	TIME	SHIPPER'S SIGNATURE
	11/11/2021			11/11/2021		<i>Kyle Lowry</i>
						GENERATOR'S SIGNATURE
						<i>Jana W. [Signature]</i>

RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED

ARRIVED AT SHIPPER:	DATE	TIME	TRACTOR #	DRIVER'S SIGNATURE
	11/11/2021		3004	<i>Kyle Lowry</i>

CONSIGNEE:

RECEIVED THE ABOVE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED

ARRIVED AT CONSIGNEE:	DATE	TIME	VEHICLE RELEASED:	DATE	TIME	CONSIGNEE'S SIGNATURE

Pavon, Martha

From: Sam Abbasi <sam@gmetesting.com>
Sent: Thursday, December 9, 2021 12:38 PM
To: Pelton, David
Cc: Draper, Jason; Kunowski, Michael; rami@gmetesting.com
Subject: [External_Sender] Response to Apparent Violations/ No. 03035029/2021001 (DMNS) EA-21-134
Attachments: NRC letter 2021.12.09.pdf

Mr. Pelton,

Please find attached our response to reported violations as a result of inspection.
Let me know if there is anything else is needed or additional documents required.

Regards,

Sam Abbasi



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