

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

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| <p>1. LICENSEE/LOCATION INSPECTED: Cochran 530A East Independence Drive Union, MO 63084 REPORT NUMBER(S): 11-01</p> | <p>2. NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission, Region III 2443 Warrenville Road, Suite 210 Lisle, Illinois 60532</p> |
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| <p>3. DOCKET NUMBER(S) 030-37025</p> | <p>4. LICENSEE NUMBER(S) 24-32594-01</p> | <p>5. DATE(S) OF INSPECTION May 10, 2011</p> |
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LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied

_____ Non-cited violation(s) were discussed involving the following requirement(s):
- 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11

One Severity Level IV Violation is described in Part 2, attached.

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

| Title | Printed Name | Signature | Date |
|---------------------------|---|--------------------|-----------|
| LICENSEE'S REPRESENTATIVE | BLAKE E. MARQUART | <i>[Signature]</i> | 5/19/2011 |
| NRC INSPECTOR | Andrew M. Bramnik | <i>[Signature]</i> | 5/17/2011 |
| Branch Chief | Tamara E. Bloomer <i>[Signature]</i> | <i>[Signature]</i> | 5/18/2011 |

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:
Cochran

2. NRC/REGIONAL OFFICE
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532

REPORT NUMBER(S) 11-01

3. DOCKET NUMBER(S)
030-37025

4. LICENSEE NUMBER(S)
24-32594-01

5. DATE(S) OF INSPECTION
May 10, 2011

(Continued)

Title 10 of the Code of Federal Regulations (CFR) Section 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 107, 171-180, and 390-397.

Title 49 CFR 172.702 requires that each hazmat employer shall ensure that each hazmat employee is trained and tested, and that no hazmat employee performs any function subject to the requirements of 49 CFR Parts 171-177 unless trained, in accordance with Subpart H of 49 CFR Part 172. The terms Hazmat Employer and Hazmat Employee are defined in 49 CFR 171.8.

Title 49 CFR 172.704(a) specifies the elements of hazmat employee training as: (1) general awareness/familiarization training, (2) function-specific training, and (3) safety training. 49 CFR 172.704(c) requires, in part, that a hazmat employee receive initial training, and recurrent training at least once every three years.

Contrary to the above, between October 3, 2008 and May 10, 2011, the licensee did not provide training for its hazmat employees which satisfied the requirements in Subpart H to 49 CFR Part 172, in that five of the licensee's employees had not received recurrent hazmat training at least once every three years, and the licensee otherwise meets the definition of hazmat employer in 49 CFR 171.8. Specifically, the five employees' hazmat training certifications expired on various dates between October 3, 2008 and January 7, 2011; however, on multiple occasions between October 3, 2008 and May 10, 2011, those employees transported portable gauges containing licensed material outside of the site of usage.

The root cause of this violation was a lack of oversight of the timeliness required to complete recurrent hazmat training. As corrective actions, the employees will complete recurrent hazmat training by May 20, 2011, and before transporting a portable gauge. As long-term corrective actions, the radiation safety officer will input the hazmat training requirements into the company's Microsoft Outlook calendar to ensure that he and other gauge operators complete the training as required. These actions will be complete by May 20, 2011.

This is a Severity Level IV violation (Section 6.3.d.4)

Docket File Information
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| 6. INSPECTION PROCEDURES 87124 | 7. INSPECTION FOCUS AREAS 03.01 – 03.07 |
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SUPPLEMENTAL INSPECTION INFORMATION

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| 1. PROGRAM 3121 | 2. PRIORITY 5 | 3. LICENSEE CONTACT Blake Marquart, RSO | 4. TELEPHONE NUMBER 636-584-0540 |
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Main Office Inspection Next Inspection Date: May 2016
 Field Office Inspection _____
 Temporary Job Site Inspection _____

PROGRAM SCOPE

This was a routine inspection of an architectural, engineering, and inspection company that utilized portable moisture/density gauges for soil testing. At the time of the inspection, the licensee possessed five Humboldt Model No. 5001 gauges at its main office in Union, MO, and one Humboldt Model No. 5001 gauge at each of its field offices in Wentzville and Sunset Hills, MO. The licensee was not authorized to perform any non-routine maintenance or service activities on the gauges.

PERFORMANCE OBSERVATIONS

No work at temporary job sites was available for observation at the time of the inspection. Interviews conducted with available staff revealed an adequate level of understanding of emergency and material handling procedures and techniques. All gauges were observed as adequately secured with two independent barriers to removal while in storage. The licensee demonstrated how gauges were transported while using two independent barriers, as well as how gauges were tracked by utilization logs.

Independent measurements taken did not indicate readings in excess of Title 10 Code of Federal Regulations (10 CFR) Part 20 limits in restricted or unrestricted areas. Personal whole body dosimetry was observed during the inspection, and records did not indicate doses in excess of 10 CFR Part 20 limits. The licensee possessed a radiation survey meter that performed well in side-by-side comparisons with an NRC instrument. A records review indicated that required physical inventories, leak tests, and personnel gauge safety training had been completed.

One violation of Department of Transportation (DOT) requirements was identified during this inspection for failure to ensure that five employees completed recurrent hazmat training. The violation, root cause, and corrective actions are described in Part 2, above.