

Alaska Industrial X-ray Inc.  
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Jason M Razo  
Materials Health Physics Inspector  
U.S. Nuclear Regulatory Commission Region IV  
612 E Lamar Blvd Ste 400  
Arlington, TX 76011-4125

11/8/11


Re: Submission of Training Program for Section V Item 1 (d) per EA-10-231

Mr. Razo

Attached is the outline for the training that the Growth Company has created to fulfill Section V Item 1 (d) of Order EA-10-231.

Regards,

Donald Millar



Radiation Safety Officer  
Alaska Industrial X-ray Inc.

*Weld Inspection  
Welding Engineering  
Metallurgical Engineering*

*Welder Certification*

*Nondestructive Testing  
Gamma Ray - X-ray  
Ultrasonics*

## PROPOSED CLASS OUTLINE – AIX (11/8/11)

- I. NRC Regulatory Scheme – materials licensees
    - A. Law/regulatory overview
      - 1. Office of Enforcement
      - 2. Statutory/regulatory authority
    - B. Purpose
      - 1. Public health
      - 2. Safety
      - 3. Defense
      - 4. Security
    - C. Enforcement Process
      - 1. OE enforcement process chart
      - 2. OE escalated process chart
    - D. Assessment factors
      - 1. Actual safety consequences
      - 2. Potential safety consequences
      - 3. Impact to NRC’s abilities to perform its regulatory function
      - 4. Willful aspects of the violation
    - E. Severity levels
      - 1. Levels I – IV
      - 2. Licensees may self-correct level IV violations.
  - II. Key Regulations applicable to AIX
    - A. Public Safety
    - B. Employee Safety
    - C. Materials safety/security
  - III. Compliance Methods
    - A. Licensing
    - B. Orders modifying license
    - C. Notice of violations
  - IV. Consequences of Non-compliance
    - A. Willful violations
      - 1. Intentional or deliberate
      - 2. Reckless disregard or indifference
        - a. Voluntary choice versus inadvertence
    - B. Company liability
    - C. Individual liability
  - V. AIX’s past compliance issues
    - A. Prior N/V and civil penalty (EA-07-325; EA-08-196)
    - B. March 3, 2011 Inspection Report (030-10346/2009-001)
    - C. Why violations were considered “willful”
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- VI. Escalated Enforcement Actions
  - A. Prior escalated enforcement action within last 2 years or 2 inspections
  - B. Security level 1 or 2 violation, or,
  - C. Willful violation
- VII. Examples of Recent Enforcement Actions (Materials)

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