

NRC FORM 591M PART 1
(1-2012)
 19 CFR 2.201 **U.S. NUCLEAR REGULATORY COMMISSION**
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Allied Inspection Services, Inc. 4704 Ketchum Road, St. Clair, Michigan REPORT NUMBER(S) 12-001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenton Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-15055	4. LICENSE NUMBER(S) 21-18428-01	5. DATE(S) OF INSPECTION 07/24/2012	

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, 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 in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
 (Violations and Corrective Actions)

A. Title 10 Code of Federal Regulations (CFR) 71.5(s) 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.

Continued on NRC FORM 591M Part 2

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	THOMAS D. GRASHAW	<i>[Signature]</i>	8/10/12
NRC INSPECTOR	Bill C. Lin	<i>[Signature]</i>	8/10/12
BRANCH CHIEF	Tamara E. Bloomer	<i>[Signature]</i>	8/10/12

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(Continued)

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 2008 through July 2012, a period greater than three years, the licensee did not provide training for its hazmat employees that satisfied the requirements in Subpart H to 49 CFR Part 172. Specifically, the licensee did not provide recurrent training every three years for its hazmat employees, as required, and the licensee otherwise meets the definition of a hazmat employer in 49 CFR 171.8.

The licensee's proposed corrective actions included attending the next available DOT training class in September 2012 and tracking the training by using a calendar to ensure that the recurrent training is provided at least once every three years thereafter.

- B. 10 CFR 34.43(e)(1) requires, in part, that the radiation safety officer (RSO) or designee shall conduct an inspection program that includes the observation of the performance of each radiographer and radiographer's assistant during an actual radiographic operation at intervals not to exceed six months.

Contrary to the above, the licensee did not observe the performance of a radiographer during an actual radiographic operation between September 2011 and July 2012, an interval in excess of six months. As corrective action, the RSO committed to use a calendar as an aid to ensure that the inspections are done timely.

Docket File Information
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6. INSPECTION PROCEDURES USED 87121	7. INSPECTION FOCUS AREAS FE1-FE7
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03320	2. PRIORITY 1	3. LICENSEE CONTACT Thomas D. Grashaw, RSO	4. TELEPHONE NUMBER (810) 329-6697
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Main Office Inspection Next Inspection Date: 07/24/2013

Field Office Inspection

Temporary Job Site Inspection Plains LPG Services, St. Clair, Michigan

PROGRAM SCOPE

This was a routine inspection of a radiography licensee located in St. Clair, Michigan. The licensee currently possesses two radiography cameras and is staffed with two radiographers and one radiographer assistant. The licensee performs radiography operations at temporary job sites.

Performance Observation

The inspector observed a qualified radiographer and radiographer assistant perform two radiography exposures using an iridium-192 (Ir-192) camera. The operations were performed in accordance with all applicable regulatory requirements. The radiographer and radiographer assistant were knowledgeable of all safety requirements and procedures. The inspector observed that the licensee personnel had all of the applicable dosimetry, survey instruments, and emergency operating procedures prior to performing the exposures. The radiographers performed all of the required surveys associated with performing industrial radiography. The inspector reviewed selected records such as dosimetry records, radiation safety training, survey instruments calibrations, daily utilization logs, package receipts, and field audits. A final exit meeting was held between the inspector and the RSO by telephone on August 2, 2012.

Two violations of NRC requirements were identified.

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