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QIT ENHANCED TRAINING OUTLINE by Contractor  
(EA-11-124) Confirmatory Order

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## Hanson, Latischa

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**From:** Hanson, Latischa  
**Sent:** Wednesday, November 07, 2012 4:30 PM  
**To:** 'lamco2@aol.com'; 'Jason Stone'  
**Cc:** Vasquez, Michael  
**Subject:** RE: QITI confirmatory order managers training outline

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	'lamco2@aol.com'	
	'Jason Stone'	
	Vasquez, Michael	Delivered: 11/7/2012 4:30 PM

Laurie,

This is Latischa Hanson, the inspector for this licensee's operation for which the Order was issued. I tried to call you at (936) 271-1487, but got a recording that said it was not a working number.

I am reviewing the training outline you submitted for the managers & had a couple of questions regarding the following areas in the Order:

- 1.) **Section (V) C.** (states in part): QIT will enhance its training program for employees conducting radiographic operations. The goal of the changes is to conduct licensed operations safely and deter future deliberate violations by ensuring employees (including licensee managers) understand the importance of the NRC places on violations associated with deliberate misconduct and careless disregard.

**Section (V) C. 1. a)** (states in part): Within 60 days of the Confirmatory Order, QIT will contract with an external contractor to assist in the development of a QIT training program regarding the NRC Enforcement process. The external contractor will work with a QIT management representative. This QIT training program will address all of the elements in condition C.3 below and, at a minimum, the types of willfulness (careless disregard and deliberate misconduct), the potential enforcement sanctions that the Department of Justice may take, and the potential enforcement sanctions that the NRC may take against employees who engage in deliberate misconduct. As discussed in item C.1.d, the contractor **will provide training to all QIT managers.**

**Section (V) C.3** (states in part): The contractor identified in section C.1 will also make enhancements to QIT's established training program. The training procedures for the current employees, new employees and annual refresher training will be modified to include the following elements:

**3.a.** (states in part): A discussion of NRC's policy statement of safety culture [76 FR 34773] and QIT management's support of that policy.

**b.** (states in part): Elements of willfulness discussed in Chapter 6 of the NRC Enforcement Manual...

**c.** (states in part): Potential criminal sanctions...

**d.** (states in part): Requirements of 10 CFR 30.10...and 10 CFR 30.7

**e.** Instructions on the importance of understanding and following QIT's internal procedures and the regulatory requirements associated with radiographic operations.

**f.** Discussion on when to suspend work activities and to verify whether specific circumstances call for implementing corrective actions and resuming work activities or stopping work activities in order to protect the health and safety of the workers and the public.

**g.** The importance of having the required documents (Operating & Emergency procedures, shipping papers, copies of regulations, etc.) with the radiography equipment when working temporary job sites.

2) In reviewing the outline you submitted, I was able to correspond the following on your training outline with the requirements above:

3.a. (states in part): A discussion of NRC's policy statement of safety culture [76 FR 34773] and QIT management's support of that policy.

**II.A.3**

b. (states in part): Elements of willfulness discussed in Chapter 6 of the NRC Enforcement Manual...

**VI.**

c. (states in part): Potential criminal sanctions...

**VII. Punishment & VII. C. Criminal Sanctions**

d. (states in part): Requirements of 10 CFR 30.10...and 10 CFR 30.7

**VIII Employee Protection (10 CFR 30.7) and VI. B. 1) c. 3. Review 10 CFR 30.10**

In regards to the following items, I could not find them specifically listed in your outline:

- I. B. 1, 2* e. Instructions on the importance of understanding and following QIT's internal procedures and the regulatory requirements associated with radiographic operations.
- IV. G. 1-8* f. Discussion on when to suspend work activities and to verify whether specific circumstances call for implementing corrective actions and resuming work activities or stopping work activities in order to protect the health and safety of the workers and the public.
- New VI. (conting. measure)* g. The importance of having the required documents (Operating & Emergency procedures, shipping papers, copies of regulations, etc.) with the radiography equipment when working temporary job sites.

Would you please review & get back with me to let me know how you plan to address them or if I missed it in the outline.

Thank you for your assistance with this review. Upon receipt of the requested information, we will proceed with the reviewing of this portion of QIT's Confirmatory Order compliance.

Latischa Hanson



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# LAMCO & ASSOCIATE



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## **SAFETY CULTURE OUTLINE FOR QITI MANAGEMENT**

**TIMELINE: 8 HOURS**

**THE TRAINING IS A CLASSROOM TRAINING WITH A POWERPOINT PRESENTATION**

- I. MANAGEMENT, SAFETY REPRESENTATIVE & SUPERVISORS ROLES IN A HOSTILE-FREE WORK ENVIRONMENT. (estimated 45 min)**
  - A. Leadership – the starting point**
    - 1) Role Model
    - 2) Set & Enforce Policies
    - 3) Demonstrate
    - 4) Communicate
  - B. Following Procedures**
    - 1) Understanding & following the procedures in QITI's O & E and Safety procedures set down when performing Radiography
    - 2) Review & explain the importance of following the regulations set by the regulatory agencies. (NRC, agreement states, DOT)
  - C. Accident Investigation Process**
- II. ORIGIN OF SAFETY CULTURE (estimated 30 minutes)**
  - A. How & Why Safety Culture came about**
    - 1) Where & When first established & Used
    - 2) Review how safety culture is working in other industries.
    - 3) Review & discuss NRC's safety culture brochure
    - 4) How to incorporate the safety values into the company.
- III. ETHICS, MORALS & INTEGRITY (estimated 1 hour)**
  - A. Define Ethics & Morals**
  - B. Explain Integrity**
  - C. Discuss fraud in the workplace**
    - 1). Review current business fraud
    - 2). Cases in the news
  - D. Human error**
    - 1). Examples of accidents in the workplace
    - 2). Examples of accidents in industrial radiography
  - E. Taking Responsibility**

**IV. RECOGNIZING & REPORTING SAFETY VIOLATIONS (estimated 1 hour)**

- A. Accidents**
- B. Primary Causes**
- C. Human Factors**
- D. Following Procedures**
- E. Reporting procedures**
- F. No concern is too small or insignificant**
- G. Responding to a safety concern**
  - 1) Suspending work activities**
  - 2) Correcting the problem**
  - 3) Corrective action taken or needed to be taken**

**V. FOUR A'S (estimated 45 minutes)**

- A. Attitude**
  - 1) Learning to deal with all types**
- B. Awareness**
- C. Action**
- D. Accountability**

**VI. PERFORMING THE TASK**

- A. Ensure you have all the required equipment to perform radiography**
- B. Ensure you have all the required documentation & that you understand the importance of it's existence**
  - 1) QITI O & E**
  - 2) Agreement State/ NRC Regulations**
  - 3) DOT regulations**
  - 4) Survey sheets/Shipping papers**
- C. Follow the security procedures as set forth by QITI as well as the NRC**

**VII. WILLFULNESS (estimated 1 hour)**

- A. Define Willfulness**
- B. Review NRC Escalated Manual Ch 6**
  - 1) Explain Willful violations**
    - a. Intentional or Deliberate**
    - b. Careless Disregard**
    - c. Basic elements of a deliberate violation**
      - 1. Review elements**
      - 2. Examples of deliberate**
      - 3. Review 10CFR 30.10**

**VIII. PUNISHMENT (estimated 30 minutes)**

- A. Company punishment to supervisors/employees**
- B. NRC sanctions against company/employees**
  - 1) Escalated Enforcement**
  - 2) Civil Penalty**
  - 3) Revoke or suspend license**
- C. Criminal sanctions**

**IX. EMPLOYEE PROTECTION (estimated 30 minutes)**

- A. Review 10 CFR 30.7**
- B. Discuss & Explain discrimination**
- C. Management Support**
- D. Accountability**

**X. HUMAN FACTORS (estimated 30 minutes)**

- A. Stress**
- B. Health**
- C. Environment**

**XI. OPEN DISCUSSION (estimated 45 minutes)**

- A. Questions & Answers**
- B. Exam**