

U.S. NUCLEAR REGULATORY COMMISSION  
REGION 1

INSPECTION REPORT

Inspection No. 03038594/2013001

Docket No. 03038594

License No. 20-35022-01

Licensee: CSMI, LLC

Location: 60 Island Street  
Lawrence, Massachusetts 01840-1835

Inspection Location: Lawrence, Massachusetts

Inspection Dates: September 25-26 and October 29, 2013 (Telephone Exit)

Inspector: Deborah A. Piskura  
Health Physicist  
Materials Inspection Branch  
Division of Nuclear Materials Safety  
Region III

Approved By: Marc S. Ferdas, Chief  
Decommissioning Branch  
Division of Nuclear Materials Safety  
Region I

## **EXECUTIVE SUMMARY**

CSMI, LLC  
Lawrence, Massachusetts  
NRC Inspection Report No. 03038594/2013001

An announced initial safety inspection was conducted at CSMI, LLC in Lawrence, Massachusetts on September 25-26, 2013. An in-office review of information received during the on-site inspection was also performed. The inspection was conducted pursuant to NRC Inspection Manual Chapter 2800 and NRC Inspection Procedure 87126. The inspection consisted of observations by the inspector, interviews with personnel, and a review of procedures and records. A telephone exit meeting was conducted on October 29, 2013.

Based on the results of this inspection, no violations of NRC requirements were identified. At the time of this inspection, no licensed activities had been performed by CSMI, LLC in NRC jurisdiction.

## REPORT DETAILS

### 1. **Organization, Training, and Service Activities**

#### a. Inspection Scope

An announced initial safety inspection was conducted at CSMI, LLC in Lawrence, Massachusetts on September 25-26, 2013. An in-office review of information received during the on-site inspection was also performed. The inspection was conducted pursuant to Inspection Manual Chapter 2800 and Inspection Procedure 87126.

The inspector reviewed CSMI, LLC's organizational structure and scope of its licensed program to determine compliance with NRC rules and regulations and license conditions. The inspection consisted of observations by the inspector, interviews with CSMI, LLC personnel, and a review of documents, procedures and records. The inspection included a review of CSMI, LLC personnel's training records, qualifications and experience; and a discussion of their proposed service activities.

#### b. Observations and Findings

CSMI, LLC is a private company that provides engineering, technology, security, and force protection services to U.S. military bases and other customers worldwide. CSMI, LLC currently employs individuals at its Lawrence, Massachusetts, office and individuals at various locations worldwide who provide maintenance services for various scanning systems that utilized x-ray as the imaging source (non-NRC licensed material). CSMI, LLC previously provided services as a subcontractor for several international clients located outside of NRC's jurisdiction for approximately 10 years.

In December 2012, CSMI, LLC applied for an NRC license to perform service activities on gauging systems containing cesium-137 or cobalt-60 sources for the non-intrusive inspection of vehicles and cargo. NRC issued the initial license on February 12, 2013. On March 18, 2013, NRC issued Amendment No. 1, which authorized a new Radiation Safety Officer. The daily operations are managed by the Vice President and the radiation safety programs are managed by the Radiation Safety Officer. The inspector noted that as of the time of the inspection, CSMI, LLC had not initiated licensed activities authorized under its NRC license in areas within NRC jurisdiction.

CSMI, LLC provided the inspector copies of training certificates for selected members of its staff whose duties involved radiation safety activities. The inspector noted that for individuals designated as authorized service technicians or authorized users, the certificates documented that the individuals attended a maintenance course

offered by one of the gauge systems manufacturers, at its San Diego, California training facility. It also indicated that the course was approximately two weeks. The inspector also noted that all individuals who had been previously listed as the Radiation Safety Officer or a backup/alternate Radiation Safety Officer had attended a Radiation Safety Officer training course. The inspector determined that the courses appeared to satisfy the training criteria for an authorized user outlined in NUREG 1556, Volume 18, "Consolidated Guidance About Materials Licensees – Program Specific Guidance About Service Provider Licensees."

The inspector reviewed CSMI, LLC's service procedures, radiation safety procedures and emergency procedures. During discussions with the Radiation Safety Officer, CSMI, LLC provided clarification to statements made in their license application. Specifically, CSMI, LLC stated that it would follow the user's instructions outlined in the operator's manual that is readily available at the computer console for the device or on the Internet. During an emergency, the customer, not CSMI, LLC, would notify the device manufacturer per contractual agreements with their customer. CSMI, LLC also stated that requests for replacement parts, would originate from the client or the owner of the device and not CSMI, LLC.

The inspector noted that CSMI, LLC had not developed detailed written operating and emergency procedures associated with activities authorized on their license. The inspector also noted that CSMI, LLC did not have calibrated survey instrumentation and personnel were not issued dosimetry. CSMI, LLC personnel stated that they would develop the appropriate written procedures; and service technicians would be provided calibrated survey instrumentation and issued personnel dosimetry prior to performing service activities on the devices authorized on its license in NRC jurisdiction.

c. Conclusions

Based on the results of this inspection, no violations of NRC requirements were identified. At the time of this inspection, no licensed activities had been performed by CSMI, LLC in NRC jurisdiction.

**2. Exit Meeting**

On October 29, 2013, a telephone exit meeting was conducted with Michael Thompson, President, and other CSMI, LLC personnel to discuss the results of the inspection. CSMI, LLC did not identify any information reviewed during the inspection and proposed for inclusion in the inspection report as proprietary in nature.

## **ATTACHMENT: SUPPLEMENTAL INFORMATION**

### **LIST OF PERSONS CONTACTED**

#\*Michael Thompson, President  
#\*Randall Kaminsky, Sr. Vice President  
#\*Christopher Knox, Program Manager, Radiation Safety Officer

#Individual(s) present at entrance meeting  
\*Individual(s) present at telephonic exit meeting

### **LIST OF DOCUMENTS REVIEWED**

Letter dated December 3, 2012 with attached application (ML12340A385)  
Letter dated January 7, 2013 (ML13011A413)  
Letter dated January 18, 2013 (ML13023A187)  
NRC Telephone Conversation Record January 22, 2013 (ML13028A087)  
NRC Telephone Conversation Record January 23, 2013 (ML13028A092)  
Training certificates provided by CSMI, LLC  
Organizational chart provided by CSMI, LLC