



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

April 14, 2014

Docket No. 03038536

License No. 06-31472-01

Manish Gupta  
Vice President  
GM2 Associates, Inc.  
115 Glastonbury Boulevard  
Glastonbury, CT 06033

**SUBJECT: NRC INSPECTION REPORT NO. 03038536/2014001, GM2 ASSOCIATES, INC., GLASTONBURY, CONNECTICUT SITE AND NOTICE OF VIOLATION**

Dear Mr. Gupta:

On March 10-11, 2014 and continuing in-office until April 7, 2014, Farrah Gaskins of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. Additional information provided in your correspondence dated March 18, 2014, was also examined as part of the inspection. The findings of the inspection were discussed with Mr. Joshua Scott of your organization at the conclusion of the inspection.

Based on the results of this inspection and in accordance with the NRC Enforcement Policy, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involved the failure to conduct and document physical inventories.

The violation is cited in the enclosed Notice of Violation (Notice), because the violation was identified by the NRC. The NRC expects licensees to conduct their programs with meticulous attention to detail and high standards of safety and compliance. Because of the potential for radiation exposure to employees and the public which could result from failure to comply with NRC requirements, you must conduct your program according to NRC regulations, the conditions of your NRC license, and the representations made in your application.

You are required to respond to this letter and should follow the instruction specified in the enclosed Notice when preparing your response.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC website at

M. Gupta

2

<http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Please contact Farrah Gaskins at (610) 337-5143 if you have any questions regarding this matter.

Sincerely,

***Original signed by Blake Welling***

Blake Welling, Chief  
Commercial, Industrial, R&D and Academic Branch  
Division of Nuclear Materials Safety

Enclosure:  
Notice of Violation

cc: Joshua F. Scott, Radiation Safety Officer  
State of Connecticut

M. Gupta

2

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Blake Welling, Chief  
Commercial, Industrial, R&D and Academic Branch  
Division of Nuclear Materials Safety

Enclosure:  
Notice of Violation

cc: Joshua F. Scott, Radiation Safety Officer  
State of Connecticut

Distribution:  
B. Bickett, RI

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**SUNSI Review Complete:** FGaskins

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OFFICE	DNMS/RI	N	DNMS/RI	N	DNMS/RI		
NAME	FGaskins\fcg		BWelling\bw				
DATE	4/10/14		4/14/14				

OFFICIAL RECORD COPY

## NOTICE OF VIOLATION

GM2 Associates, Inc.  
Glastonbury, CT

Docket No. 03038536  
License No. 06-31472-01

During an NRC inspection conducted on March 11, 2014, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 30.34(c) requires, in part, that each person licensed by the Commission pursuant to the regulations in this Part, shall confine his possession and use of the byproduct material to the locations and purposes authorized in the license.

NRC License No. 06-31472-01, Condition No. 14 states, in part, that the licensee shall conduct a physical inventory every six months, or at intervals approved by the NRC to account for all sources and devices received and possessed under the license. Records of inventories shall be maintained for five years from the date of each inventory and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.

Contrary to the above, the licensee did not conduct or document physical inventories as required by License Condition No. 14. Specifically, between April 12, 2013 and March 11, 2014, a period greater than six months, the licensee had not conducted or documented physical inventories.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

Pursuant to the provisions of 10 CFR 2.201, GM2 Associates, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction.

Notice of Violation  
GM2 Associates, Inc.

2

However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated This 14 day of April 2014