

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1 LICENSEE/LOCATION INSPECTED: Prism (USA) Inc. 22 W 48 th Street, Suite 805 New York, NY 10036 REPORT NUMBER(S) 2015-001		2 NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission Region I, 2100 Renaissance Blvd, Suite 100 King of Prussia, Pennsylvania 19406-2713	
3 DOCKET NUMBER(S) 030-38697	4 LICENSE NUMBER(S) 31-35116-01E	5 DATE(S) OF INSPECTION August 19, 2015; continuing in office to September 17, 2015	

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) and corrective action(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 the 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)

10 CFR 32.12 requires, in part, that each person licensed under 10 CFR 32.11 shall maintain records of all transfers of byproduct material and file a report with the Director of the Office of Federal and State Materials and Environmental Management Programs by an appropriate method listed in 10 CFR 30.6(a) of this chapter. The licensee must file the report, covering the preceding calendar year, on or before January 31 of each year.

Contrary to the above, as of August 19, 2015, the licensee did not file a report of all transfers of byproduct material in accordance with 10 CFR 32.12. Specifically, the licensee was issued an NRC exempt distribution license under 10 CFR 32.11 on March 10, 2014, and a report was not submitted for calendar year 2014.

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

The licensee satisfactorily provided the missing 2014 report on September 9, 2015, and stated that they have implemented a calendar reminder for future reports, including the next report required for calendar year 2015; due on or before January 31, 2016. No further corrective action or written response is required.

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	Alpesh Jivani	SEE BELOW.	9/21/2015
NRC INSPECTOR	James R. Cassata	<i>James R. Cassata</i>	9/17/2015
BRANCH CHIEF	<i>AJ</i> BLAKE WELLING	<i>Blake Welling</i>	9/21/15