

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Northwest Design Group, LLC 2940 Parkview Drive Petoskey, MI 49770 REPORT NUMBER(S) 2015-001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S) 030-33451	4. LICENSE NUMBER(S) 21-26560-01	5. DATE(S) OF INSPECTION 08/27/15, with in-office review through 11/05/15	

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.

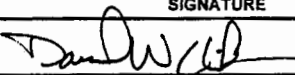

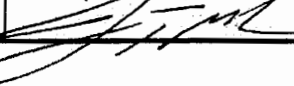
(Violations and Corrective Actions)

Contrary to Condition 13.A of NRC Materials License No. 21-265601-01, since January 2014, Northwest Design Group, LLC failed to test sealed sources contained in Troxler 3400 series portable moisture density gauges for leakage and/or contamination at intervals not to exceed 12 months, as specified in certificate of registration No. NC-636-D-130-S issued by the State of North Carolina, on two occasions. The licensee failed to leak test one gauge between January 2014 and April 2015, and another between August 2014 and October 2015. Both periods exceeded 12 months.

As corrective action, the licensee performed leak testing in October 2015 to restore compliance, and created entries in its company-wide electronic calendar to enable all individuals involved in the conduct and oversight of gauge use to track the completion of future leak tests, and to ensure their completion at the required intervals.

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	DANIEL W ALRICH		12/1/15
NRC INSPECTOR	Ryan Craffey		11/24/15
BRANCH CHIEF	Aaron McCraw		11/23/15

Docket File Information

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6. INSPECTION PROCEDURES USED 87124	7. INSPECTION FOCUS AREAS All
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SUPPLEMENTAL INSPECTION INFORMATION

1. PROGRAM CODE(S) 03121	2. PRIORITY 5	3. LICENSEE CONTACT Daniel Ulrich - RSO	4. TELEPHONE NUMBER (231) 348-1180
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Main Office Inspection Next Inspection Date: 08/27/2020

Field Office Inspection _____

Temporary Job Site Inspection Petoskey School Construction Project, Petoskey, MI

PROGRAM SCOPE

This was an unannounced routine inspection of a professional engineering consulting firm authorized to use and store portable moisture density gauges containing byproduct material at its facility in Petoskey, Michigan and at temporary job sites within NRC jurisdiction. At the time of the inspection, the licensee had approximately 10 authorized users trained to operate its Troxler 3400 series gauges, and possessed a radiation survey instrument for use in the event of an emergency.

PERFORMANCE OBSERVATIONS: The inspector observed the conduct of licensed activities at a nearby construction project on Northmen Drive in Petoskey. The inspector found that the gauge user on-site maintained control and constant surveillance of her gauge at all times. The gauge user maintained appropriate shipping labels and shipping papers, wore dosimetry as required by licensee procedures, and through discussions various topics including security and transportation of portable gauges, emergency procedures and ALARA practices, demonstrated adequate knowledge of radiation protection principles and licensee procedures. The inspector toured the main office in Petoskey to evaluate the licensee's measures for materials security, hazard communication and exposure control. Independent surveys of this facility with material in storage found no exposures to members of the public in excess of regulatory limits. The inspector discussed a variety of topics with the licensee's staff at the main office, including emergency response, survey meter use, leak test collection and authorized user training. The inspector also reviewed a selection of available records on-site, including utilization logs, leak test and dosimetry results, radiation safety and hazmat training.

During a review of leak test records, the inspector identified a violation of Condition 14.A for the failure to test two gauges for leakage at the intervals specified in the applicable certificate of registration. One gauge was not tested between January 2014 and April 2015; another between August 2014 and October 2015. The inspector determined that the root cause of the violation was insufficient oversight of the program, as the RSO had in recent years spent a significant amount of time away from the office on job sites. As corrective action, the licensee performed leak testing in October 2015 to restore compliance, provided documentation of the result (no leakage was detected) to the inspector on November 5, 2015, and created entries in its company-wide electronic calendar to enable all individuals involved in the conduct and oversight of licensed activities to track the completion of future leak tests, and to ensure their completion at the required intervals.