



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

July 1, 2016

EA-16-134

Mr. Dave Hollander
Radiation Safety Officer
Harrison Steel Castings Company
900 Mound Street
Attica, IN 47918

SUBJECT: NRC SPECIAL INSPECTION REPORT NO. 03004335/2016002(DNMS)
HARRISON STEEL CASTINGS COMPANY

Dear Mr. Hollander:

From May 6 through June 10, 2016, an inspector from the U.S. Nuclear Regulatory Commission (NRC) performed an in-office review of the circumstances surrounding the conduct of radiographic operations at your facility in Attica, Indiana. The NRC initiated this review after you contacted the inspector, Mr. Ryan Craffey of my staff, to report that one of your radiographers had left his personnel dosimeter inside a permanent radiographic installation during one shot of radiographic operations on the morning of May 5, 2016.

During this in-office review, the NRC staff examined activities conducted under your license related to public health and safety. The staff completed this review through an evaluation of the information you provided via email, and through a follow-up interview with you via telephone. In addition, the staff examined your compliance with the Commission's rules and regulations.

Based on the results of this review, the NRC has determined that a Security Level IV Violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy, which can be found on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation concerned an isolated failure to wear a personnel dosimeter at all times during radiographic operations, as required by Title 10 of the *Code of Federal Regulations* (CFR) Part 34.47(a). The NRC determined that the violation met the following criteria from Section 2.3.2 of the Policy to be considered a Non-Cited Violation (NCV): (1) you identified the violation; (2) you corrected or committed to correct the violation within a reasonable period of time; and (3) the violation was not considered repetitive or willful. Therefore, as a credit to your radiation safety program in identifying and correcting such violations in a timely fashion, the NRC will not issue a Notice of Violation on this matter.

The inspector determined that the root cause of the violation was an oversight by the radiographer, who did not check to ensure that all required dosimetry was in place prior to cranking out the source. The radiographer's badge was inadvertently left in the permanent radiographic installation during one shot and received an excessive exposure. As corrective action, you submitted the radiographer's badge for processing, the results of which indicated

that the badge received 4,154 millirem during the monitoring period (April 15 through May 15, 2016). You requested that the badge processor remove this exposure from the radiographer's dose of record, as the dose appeared to be invalid: neither of the radiographer's pocket ionization chambers indicated any exposure for the monitoring period. In addition, you stated that the radiographer's supervisor discussed with him the importance of ensuring that personnel dosimetry is worn at all times during radiographic operations. You also stated that the radiographer committed to wearing his dosimetry in a more secure location on his person.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance will be achieved is already adequately addressed on the docket in this letter. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agency wide Documents Access and Management System (ADAMS), accessible from the NRC's website at <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 publicly available without redaction.

Please feel free to contact Mr. Craffey of my staff if you have any questions regarding this correspondence. Mr. Craffey can be reached at 630-829-9655.

Sincerely,

/RA by Deborah A. Piskura Acting for/

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 030-04335
License No. 13-02141-01

cc: State of Indiana

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