



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

September 12, 2016

EA-16-145

Mr. Doug Miskell
Radiation Safety Officer
Applus RTD USA, Inc.
34920 Petrol Road
Bakersfield, CA 93308

SUBJECT: NRC INSPECTION REPORT 030-38291/2016-001

Dear Mr. Miskell:

This letter refers to the routine, unannounced inspection conducted on February 9 and 11, 2016, at your facility in Manchester, Connecticut. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of examination of procedures and representative records, observations of activities, independent radiation measurements, and interviews with personnel.

The enclosed report presents the results of this inspection. The inspectors discussed the preliminary inspection findings with Mr. Alan Crawford, Applus RTD USA, Inc.'s eastern regional radiation safety officer on February 11, 2016, at the conclusion of the onsite portion of the inspection. The inspection continued through July 27, 2016, with the review of selected procedures and supporting documents. A final exit briefing was conducted telephonically with you on August 25, 2016.

Based on the results of this inspection, apparent violations of NRC requirements were identified and are being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. In addition, apparent violation(s) of security-related requirements were identified and are being considered for escalated enforcement action. The current Enforcement Policy is on the NRC's Website at www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The circumstances surrounding the apparent violations, the significance of the issues, and the need for lasting and effective corrective action were discussed with Mr. Crawford at the conclusion of the onsite portion of the inspection and with you during the final exit briefing.

Before the NRC makes a final enforcement decision, we are providing you an opportunity to (1) respond in writing to the apparent violations addressed in this inspection report within 30 days of the date of this letter, (2) request a Predecisional Enforcement Conference (PEC), or (3) request alternative dispute resolution (ADR). If a PEC is held, the NRC will issue a meeting notice to announce the time and date of the conference; however, the PEC will be closed to

Enclosure 2 contains Security – Related Information. When separated from Enclosure 2, this letter and Enclosure 1 are decontrolled.

D. Miskell

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public observation since security-related information will be discussed. If you decide to participate in a PEC or pursue ADR, please contact Mr. Ray L. Kellar, P.E., Chief, Nuclear Materials Safety Branch A, at 817-200-1191, within 10 days of the date of this letter.

A PEC should be held within 30 days and an ADR session within 45 days of the date of this letter. If an adequate response is not received within the time specified, the NRC will proceed with its enforcement decision or schedule a PEC. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

If you choose to provide a written response, it should be clearly marked as a "Response to Apparent Violations in NRC Inspection Report 030-38291/2016-001; EA-16-145," and should include for each apparent violation: (1) the reason for the apparent violation or, if contested, the basis for disputing the apparent violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. Additionally, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Center, Washington DC 20555-0001, with a copy mailed to the Director, Division of Nuclear Materials Safety, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, within 30 days of the date of this letter.

If you choose to request a PEC, the conference will afford you the opportunity to provide your perspective on these issues and any other information that you believe the NRC should take into consideration before making an enforcement decision. The decision to hold a conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference would be conducted to obtain information to assist the NRC in making an enforcement decision. The topics discussed during the conference may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned.

In presenting your corrective action, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violations. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful. You can find an updated excerpt from NRC Information Notice 96-28 on the NRC Web site at <http://www.nrc.gov/docs/ML0612/ML061240509.pdf>.

In lieu of a PEC, you may also request ADR with the NRC in an attempt to resolve this issue. Alternative dispute resolution is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained mediator works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues.

D. Miskell

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Additional information concerning the NRC's program can be obtained at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>. The Institute on Conflict Resolution at Cornell University has agreed to facilitate the NRC's program as a neutral third party. Please contact the Institute on Conflict Resolution at 877-733-9415 within 10 days of the date of this letter if you are interested in pursuing resolution of these issues through ADR.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter and Enclosure 1 will be made available for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System, (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

However, Enclosure 2 contains security-related information in accordance with 10 CFR 2.390(d)(1) and its disclosure to unauthorized individuals could present a security vulnerability. Therefore, the material in Enclosure 2 will not be made available electronically for public inspection in the NRC Public Document Room or from ADAMS. If security-related information is necessary to provide an acceptable response, please mark your entire response security-related information in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

If you have any questions concerning this matter, please contact Mr. Kellar at (817) 200-1191.

Sincerely,

/RA by LLHowell Acting For/

Mark R. Shaffer, Director
Division of Nuclear Materials Safety

Docket No. 030-38291
License No. 04-29076-02

Public enclosure:

1. NRC Inspection
Report 030-38291/2016-001
w/attachment

Nonpublic enclosure

2. Security-Related Information
w/attachment

cc w/enclosures: see next page

D. Miskell

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cc w/enclosures:

Gonzalo L. Perez, Branch Chief
Radiologic Health Branch
Div. of Food, Drug & Radiation Safety
CA Department of Health Services
P.O. Box 997414, MS-7610
Sacramento, CA 95899-7414

Jeffrey D. Semancik, Director
Dept. of Energy and Environmental Protection
Radiation Division
79 Elm Street
Hartford, CT 06106-5127

D. Miskell

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Nonpublic enclosure:

- 2. Security-Related Information
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cc w/enclosures: see next page

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Letter to Doug Miskell from Mark R. Shaffer dated September 12, 2016

SUBJECT: NRC INSPECTION REPORT 030-38291/2016-001

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**U.S. Nuclear Regulatory Commission
Region IV**

Docket No. 030-38291

License No. 04-29076-02

Report No. 030-38291/2016-001

EA No. EA-16-145

Licensee: Applus RTD USA, Inc.

Field Office: 275 Progress Drive
Manchester, Connecticut

Inspection Dates: February 9 and 11, 2016, with
continued inspection activities
through July 27, 2016

Exit Meeting Date: August 25, 2016

Inspectors: John J. Miller, Health Physicist, Region I
Leo Wardrobe, Health Physicist, Region I
Jason C. Dykert, Health Physicist, Region IV

Approved By: Ray L. Kellar, P.E.
Chief, Nuclear Materials Safety Branch A
Division of Nuclear Materials Safety Region IV

Enclosure 1

EXECUTIVE SUMMARY

**Applus RTD USA, Inc.
NRC Inspection Report 030-38291/2016-001**

Program Overview

Applus RTD USA, Inc. (Applus), is authorized to possess and use byproduct material for industrial radiographic operations at its facilities in Overland, Missouri; Manchester, Connecticut; and at temporary job sites in areas of NRC jurisdiction.

Inspection Findings

During a routine, unannounced inspection conducted at the Manchester, Connecticut, field office on February 9 and 11, 2016, three apparent violations of NRC requirements were identified. The apparent violations involve the failure to: (1) administer a practical examination to a radiographer, as required by Title 10 of the *Code of Federal Regulations* (10 CFR) 34.43(e)(2); (2) ensure that a radiographers' assistant wore separate and independent forms of a direct reading dosimeter and alarming rate meter, which are used for personnel radiation-dose monitoring, as required by 10 CFR 34.47(a); and (3) ensure that its radiographers have an understanding of its license and operating and emergency procedures before allowing them to act as radiographers, as required by 10 CFR 34.43(b)(2).

Corrective Actions

The licensee described its corrective actions during telephonic interviews with the inspectors as: (1) ensuring that the three required forms of personnel monitoring are being used by each radiographer; (2) ensuring that all radiographers' job performance inspections and practical examinations, if needed, are up to date; and 3) ensuring that each radiographer had demonstrated understanding of its license and operating and emergency procedures by successful completion of a written or oral examination. Additionally, Applus' corporate radiation safety officer (RSO) participated in telephone conversations with each Applus regional RSO to ensure corrective actions for the issues identified during this inspection were understood companywide.

During the exit meeting, the NRC discussed the corrective actions completed and those planned on being taken to address the inspection findings. The NRC emphasized the importance of companywide compliance with regulatory requirements and the terms and conditions of Applus' license.

REPORT DETAILS

1 Program Overview and Inspection History (Inspection Procedure (IP) 87121)

Applus' License 04-29076-02 authorizes possession of sealed sources in radiographic exposure devices and source changers for conducting industrial radiography. Applus is authorized to perform radiographic operations out of two field offices and temporary job sites in NRC jurisdiction, as well as within a permanent radiographic installation at its Manchester, Connecticut, facility. No radiography had been performed in the permanent installation for several years. All radiographic operations were dispatched from the Manchester field office and conducted exclusively at temporary job sites several times per week by four carded radiographers and three radiographers' assistants utilizing four exposure devices containing iridium-192.

Applus has not been subject to escalated enforcement within the past 2 years or two inspections. Routine safety inspections were performed on March 17, 2015, at the Bakersfield, California, main office; on December 1-8, 2014, at a field office previously located in Idaho Falls, Idaho; on February 4, 2014, at the Bakersfield main office; and on October 29, 2012, at a field office previously located in Casper, Wyoming. In addition, NRC Region I inspected the Manchester field office in 2012 and 2013 when it was a field office for Quality Inspection Services, Inc., prior to being obtained by Applus. No violations of NRC requirements were identified.

After the onsite portion of this inspection, routine inspections were performed at the field office in Overland, Missouri, on March 17, 2016, and at the main office in Bakersfield, California, on April 27, 2016. No violations of NRC requirements were identified.

2 Management Oversight (IP 87121 - Focus Element 7)

2.1 Inspection Scope

The inspectors reviewed the licensee's management of its radiation safety program and its radiography job performance inspection program. The inspectors interviewed the field office RSO and the eastern regional RSO during the onsite portion of this inspection, and telephonically interviewed the corporate RSO on four different occasions from March 24 to July 20, 2016.

2.2 Observations and Findings

The field office RSO or his designee conducted unannounced job performance inspections to ensure regulations were being followed, typically once every 6 months for each radiographer. However, one radiographer who performed radiography on November 7 and 21, 2015, did not receive a job performance inspection by the RSO or his designee over a 6-month period, nor was he given a practical examination during the calendar year 2015.

Title 10 CFR 34.43(e)(2) requires, in part, that if a radiographer has not participated in an industrial radiographic operation for more than 6 months since the last job performance inspection, a practical examination be given before a radiographer can next participate in radiographic operations.

Typical operations at this facility involve the use of multiple technologies to perform nondestructive testing on materials. The radiographer that did not receive a job performance inspection was qualified to conduct radiography; however, the radiographer had been working with x-ray generating equipment throughout 2015 due to workload. The radiographer's supervisors overlooked the requirement to administer a practical examination before the radiographer performed radiography when more than 6 months had passed since the radiographer's previous job performance inspection. The corporate RSO had performed a high-level review and audit of the overall radiation safety program and documented the results in 2014 and 2015. However, the audit did not identify this issue.

2.3 Conclusions

The inspectors identified one apparent violation of 10 CFR 34.43(e)(2), where one radiographer was permitted to participate in radiographic operations without being given a practical examination even though more than 6 months had passed since their last job performance inspection. (030-38291/2016-001-01)

3 **Conduct of Radiographic Operations (IP 87121 - Focus Elements 1, 2, 3, and 5)**

3.1 Inspection Scope

The licensee did not have any scheduled radiography operations in NRC jurisdiction at the time of the onsite inspection, so the inspectors assessed the radiographers' competence by reviewing utilization logs, other regulatory records, observing a radiographer demonstrate a daily equipment inspection, and performing interviews.

3.2 Observations and Findings

A radiographer demonstrated a routine daily equipment inspection performed prior to beginning operations. The radiographer donned a personnel dosimeter, alarming ratemeter, and self-reading pocket dosimeter prior to removing the exposure device from storage. The radiographer thoroughly surveyed the exposure device with a calibrated and functional survey meter. The radiographer used a gauge to assess the connection fittings, and proceeded to examine the guide tube and drive cable. The daily equipment inspection was adequate. During a subsequent interview, the radiographer demonstrated a working knowledge of the Applus license and operating and emergency procedures.

The licensee's utilization logs were reviewed and the inspectors identified that on January 14 and 22, 2016, one radiographer's assistant had used a single electronic device intended to fulfill the function of both the direct reading dosimeter and an alarming ratemeter. The utilization logs indicated that on both days the radiographers' assistant had used calibrated survey instruments.

Title 10 CFR Part 34.47(a) requires, in part, that the licensee may not permit any individual to act as a radiographer or a radiographer's assistant unless, at all times during radiographic operations, each individual, wears on the trunk of the body, a direct reading dosimeter, an operating alarm ratemeter, and a personnel dosimeter.

The inspectors discussed the use of the electronic device with the eastern regional RSO and the field office RSO. Both RSO's agreed they would not have knowingly allowed the use of a single electronic device to serve as an alarming ratemeter and a direct reading dosimeter. The eastern regional RSO stated that moving forward they would ensure their radiography personnel were provided with alarming ratemeters and direct reading dosimeters, in addition to personnel dosimeters, as described in Applus' operating procedure, Section 1.12, "Personnel Monitoring Equipment." Additionally, the corporate RSO discussed their planned corrective actions with all regional RSO's via telephone calls during the week of February 15, 2016.

The eastern regional RSO stated that the apparent violation was due to a misunderstanding by an individual radiographers' assistant who believed that a single electronic device performing the simultaneous functions of an alarming ratemeter and a direct reading dosimeter was authorized for use by the NRC, as it had been by some agreement states.

The inspectors reviewed additional utilization logs and other regulatory records. Survey meters, direct reading dosimeters and alarming ratemeters had been consistently calibrated as required. Daily and quarterly equipment inspections had been performed and documented. Physical inventories and leak tests had been performed, as required.

3.3 Conclusions

The inspectors identified one apparent violation of 10 CFR 34.47(a), involving the licensee's use of a single electronic device intended to fulfill the function of a direct reading dosimeter and an alarming ratemeter. The inspectors concluded that the apparent violation was attributed to licensee personnel's misunderstanding that the electronic device was recognized by the NRC as a device that could function simultaneously as an alarming ratemeter and a direct reading dosimeter. The licensee committed to ensuring all personnel use alarming ratemeters and direct reading dosimeters, in addition to personnel dosimeters, in accordance with Applus' operating procedure, Section 1.12, "Personnel Monitoring Equipment." (030-38291/2016-001-02)

4 Training and Qualifications of Radiography Personnel (IP 87121 - Focus Element 6)

4.1 Inspection Scope

The inspection included a review of the licensee's training program. The inspectors interviewed the RSO, radiography personnel, and selected records.

4.2 Observations and Findings

All radiographers at the Connecticut facility were certified to perform radiography through a radiographer certification program in accordance with the criteria specified in Appendix A to 10 CFR Part 34. A review of several radiographers' certification cards verified that the individuals were currently certified to perform radiography work. The licensee provided in-house training to radiographers' assistants who were required to pass written and practical examinations demonstrating competence in the licensee's operating and emergency procedures and in the use of radiography equipment. After

completing a minimum of 2 months of on-the-job training under a radiographer's supervision, an assistant was eligible to take the radiographer's certification examination.

Through a review of the examination records and utilization logs, the inspectors discovered that one radiographer had not successfully completed a written or oral examination covering Applus' operating and emergency procedures prior to acting as a radiographer for the licensee.

Title 10 CFR 34.43(b)(2) requires, in part, that the licensee may not permit an individual to act as a radiographer until the individual has demonstrated understanding of the licensee's license and operating and emergency procedures by successful completion of a written or oral examination.

Although the radiographer's certification was current and he had been performing radiographic operations for another company prior to his start date for Applus in July 2015, the radiographer was allowed to perform radiography on 15 occasions between November 7, 2015 and February 1, 2016 without successfully completing a written or oral examination covering Applus' license and specific operating and emergency procedures.

This individual was certified and qualified as a Level II radiographer by the American Society of Nondestructive Testing (expiration date November 2017). There were no performance issues identified with this failure to complete a written or oral examination.

4.3 Conclusions

The inspectors identified one apparent violation of 10 CFR 34.43(b), where Applus permitted an individual to act as a radiographer when the individual had not demonstrated his understanding of Applus' license and operating and emergency procedures by successfully completing a written or oral examination covering that material. Applus had no records of examining this individual, and neither the field office RSO or the eastern regional RSO could verify that the radiographer had successfully completed an examination covering their operating and emergency procedures. (030-38291/2016-001-03)

5 Personnel Radiation Protection (IP 87121 - Focus Element 4)

5.1 Inspection Scope

The inspectors interviewed the RSO, radiography personnel and reviewed the dosimetry reports.

5.2 Observations and Findings

The inspectors reviewed personnel dosimetry records from September 2013 through November 2015. No individual had received a radiation dose in excess of the regulatory limits. The licensee used an accredited dosimetry vendor to process their dosimeters. During an interview with the field office RSO he confirmed that there had not been any incidents since the last inspection such as a source hang-up or a disconnect and there

was no reason to believe that any individual had received an exposure in excess of the regulatory limits.

The inspectors attempted to test the audible and visible alarms on the permanent radiographic installation that was authorized in Condition 11 of Amendment No. 10 of the Applus license. The field office RSO stated that the permanent installation has not been used for several years and the units are currently used exclusively for x-ray operations. The audible and visible alarm was not functional. The inspectors informed the field office RSO and eastern regional RSO that if radiography operations resume in the future, then Applus will have to assure that the permanent installation is equipped with an operational audible and visible alarm system consistent with 10 CFR 34.33. Both the field office RSO and the eastern regional RSO acknowledged the requirement to have a fully functional alarm system prior to any resumption of radiography operations in the permanent installation.

5.3 Conclusions

Based on the above, the inspectors determined that the no individual's dose exceeded NRC regulatory radiation exposure limits.

6 Exit Meeting Summary

The inspectors discussed the preliminary inspection findings with the field office RSO and the eastern regional RSO during a debriefing conducted on February 11, 2016. The inspectors then discussed the inspection activities, requirements reviewed, and the apparent violations described in this report with the corporate RSO and the eastern regional RSO, during a final telephonic exit meeting on August 25, 2016.

SUPPLEMENTAL INSPECTION INFORMATION

LIST OF PERSONNEL CONTACTED

Alan Crawford, Eastern Regional Radiation Safety Officer ^{1, 2, 3}
Dan Reguin, Radiographer
Aaron Hulbert, Radiographer
Patrick Dandeneau, Field Office Radiation Safety Officer ^{1, 2}
Jason Firth, Business Unit Manager
Marylynn Drepented, Radiographic Technical Manager
Scott P. Cargill, Main Office Radiation Safety Officer and Reviewing Official
Doug Miskell, Corporate Radiation Safety Officer ³

- 1. Individuals present at entrance meeting
- 2. Individuals present at on-site debrief
- 3. Individual present at exit meeting

INSPECTION PROCEDURES USED

87121 Industrial Radiography Programs

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

030-38291/2016-001-01	APV	The licensee failed to administer a practical examination after six months had passed since the last job performance inspection. [Section 2, 10 CFR 34.43(e)(2)]
030-38291/2016-001-02	APV	The licensee failed to ensure that radiographers and radiographer assistants wear separate and independent forms of a direct reading dosimeter and alarming ratemeter. [Section 3, 10 CFR 34.47(a)]
030-38291/2016-001-03	APV	The licensee failed to ensure that all radiographers demonstrate understanding of the Applus license and operating and emergency procedures by successful completion of a written or oral examination prior to their acting as a radiographer. [Section 4, 10 CFR 34.43(b)]

Closed

None

Discussed

None

Attachment