

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
3	8/16/2016	NRC approval for change of control of license
2	8/18/2011	Renewal

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was performed on October 12, 2010, with in-office review through November 1, 2010. Two violations were identified concerning: (1) the lack of appropriate labels on a transport container for a portable gauge required by Title 10 of the *Code of Federal Regulations* (CFR) 71.5 and 49 CFR 172.403 and (2) the failure to provide hazmat employee training for one employee for a period exceeding three years as required by 10 CFR 71.5 and 49 CFR 172.702. Corrective actions were completed as stated in the report, and the violations have not recurred. Based on this, the violations are closed.

No violations were cited in the previous inspection performed on October 11, 2005.

3. INCIDENT/EVENT HISTORY:

No open items or events since the last routine inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

The licensee was a civil engineering company with an office in Plymouth, Michigan. The licensee possessed two Troxler Model 3440 portable gauges as described on the license for use for around one week every other month during the construction season. The majority of gauge use was in the Detroit area, but projects were performed nationwide, including at a long-term temporary job site in New Mexico. The licensee did not perform any service or maintenance activities on its gauges; these services were performed by the manufacturer. The licensee employed six authorized gauge users who have completed manufacturers training. The devices were secured in the licensee's office in Plymouth, Michigan. The licensee secured the gauges in accordance with the two-barrier rule in their storage facility, at temporary job sites, and in vehicles.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87124

Focus Areas Evaluated: 03.01 – 03.07

At the time of this inspection, one gauge was in use in New Mexico. None were in use in NRC jurisdiction. The licensee possessed shipping papers that contained all appropriate information and were accessible in the transport vehicle. Licensee personnel demonstrated and described field use of the gauges, emergency procedures, gauge

transport, gauge storage and security, leak testing and inventory procedures, and other procedures. The inspectors noted no concerns with these activities. Interviews with licensee personnel indicated adequate knowledge of radiation safety concepts and procedures. Review of dosimetry records indicated no exposures of regulatory concern.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a calibrated Ludlum 2403 survey meter, the inspectors conducted independent surveys around the licensee's gauge storage area. The inspectors found no readings that would indicate residual contamination or exposures to members of the public in excess of regulatory limits. Survey results were consistent with licensee postings and survey records.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

The inspectors identified a violation of 10 CFR 30.34(b)(1), which states that no license issued or granted pursuant to the regulations in 10 CFR Parts 30 through 36 and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing. The violation concerned the failure to get NRC approval in writing for a transfer of ownership of the license.

Prior to the transfer of ownership, the licensee operated as Inspecsol Engineering, Inc. (IE), a subsidiary of Conestoga-Rovers & Associates (CRA). The inspectors identified that CRA merged with GHD Holdings, a Canadian company, in July 2014. Through this merger, GHD Holdings acquired full ownership of CRA and IE. Soon after this, the licensee began operating as GHD Services. However, the licensee did not notify NRC and provide required information to the NRC until June 17, 2016, and did not receive consent in writing until August 16, 2016. The change of ownership did not include any change in staffing at the office in Plymouth, Michigan.

The inspectors determined that the root cause of the violation was a lack of knowledge of the requirement. As corrective actions to restore compliance and to prevent recurrence, the licensee (1) submitted information to the NRC concerning the transfer of control of the license on June 17, 2016, and (2) has ensured that the radiation safety officer and management are aware of and understand the requirement.

5. PERSONNEL CONTACTED:

- Scott Adamowski, Vice President (by telephone)
- # Rebecca Bentley, Geotechnical Engineer and Radiation Safety Officer
- # Attended telephonic exit meeting on September 15, 2016.