



December 15, 2016

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

Response to an Apparent Violation in NRC Inspection Report 150-00026/2016-001, EA-16-232

- 1.) Two apparent violations were determined to be observed during the NRC audit of XCEL NDT on September 22, 2016. The violations were as follows: 1.) Failure to ensure that the radiographer's assistant received the minimum training required by 10 CFR 34.43(c) prior to engaging in radiographic operations, and 2.) Failure to ensure that two qualified individuals were present during radiographic operations, as required by 10 CFR 34.41(a). Both of these violations were simply caused due to XCEL NDT LLC not taking the proper time to complete the Radiation Safety Training required by the regulations. XCEL NDT LLC allowed the company work load to interfere with the correct training process.
- 2.) XCEL NDT LLC has taken several steps to ensure that this type of violation never happens again in the future. The primary resolution is that XCEL NDT LLC will not allow an assistant without their initial "40 Hour Radiation Safety Training" being completed to prior to them being the sole assistant while performing radiography. The assistant will have completed their radiation safety test prior to holding the full responsibilities that an assistant must, while radiography is being performed.
- 3.) XCEL NDT LLC has been fully in compliance and has corrected these violations since December 1, 2016.

If the NRC has any questions or concerns please feel free to contact me at colem@xcelndt.com or my cell phone # 785-614-1489.

Regards,

A handwritten signature in black ink, appearing to read "Cole Morehead", is written over the typed name.

Cole Morehead
Radiation Safety Officer
XCEL NDT LLC.