



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

March 6, 2017

Docket No. 030-35002

License No. 45-25467-01

Tadeusz W. Lewis
Principal
GeoConcepts Engineering, Inc.
19955 Highland Vista Drive
Suite 170
Ashburn, VA 20147

SUBJECT: NRC INSPECTION REPORT NO. 03035002/2016001, GEOCONCEPTS
ENGINEERING, INC., ASHBURN, VIRGINIA, AND NOTICE OF VIOLATION

Dear Mr. Lewis:

On December 1, 2016, with continuing in-office review through February 14, 2017, Steven Courtemanche of this office conducted a safety inspection at the above address and a temporary storage location in Washington, D.C. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. The findings of the inspection were discussed with Eaton King of your organization at the conclusion of the inspection by telephone on February 14, 2017.

Based on the results of this inspection and in accordance with the NRC Enforcement Policy, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violations involved the failure to review reports of personnel exposures in a timely manner as required by License Condition 19 of the above NRC license.

The violation is cited in the enclosed Notice of Violation (Notice), because the violation was identified by the NRC.

During our inspection exit meeting on February 14, 2017, Mr. King stated that GeoConcepts Engineering, Inc. is committed to radiation safety and to compliance with NRC regulations and licensed conditions. Mr. King further stated that the licensee has taken the following corrective and preventative actions to address the violation:

- 1) Dosimetry exposure records were examined to identify any other unusually high readings;
- 2) Interviewed individual(s) to determine if the dosimeter received a non-occupational radiation exposure;
- 3) Performed evaluation(s) to determine the actual occupational radiation exposure received by the individual;
- 4) Contacted the dosimetry processor to make any correction(s) in the dosimetry records; and
- 5) Provided training to all authorized users about the violation and where to keep dosimetry when not worn.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

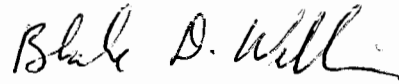
In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at: <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Please contact Steven Courtemanche at (610) 337-5075 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Blake D. Welling". The signature is written in a cursive style with a long horizontal flourish at the end.

Blake D. Welling, Chief
Commercial, Industrial, R&D, and
Academic Branch
Division of Nuclear Materials Safety

Enclosure:
Notice of Violation

cc w/Encl: Eaton King, Radiation Safety Officer
Commonwealth of Virginia

T. Lewis

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Please contact Steven Courtemanche at (610) 337-5075 if you have any questions regarding this matter.

Sincerely,

Blake D. Welling, Chief
Commercial, Industrial, R&D, and
Academic Branch
Division of Nuclear Materials Safety

Enclosure:
Notice of Violation

cc w/Encl: Eaton King, Radiation Safety Officer
Commonwealth of Virginia

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SUNSI Review Complete: SCourtemanche

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OFFICE	DNMS/RI	N	DNMS/RI				
NAME	SCourtemanche <i>ARC</i>		BWelling <i>pu</i>				
DATE	<i>2/28/2017</i>		<i>3/6/17</i>				

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

GeoConcepts Engineering, Inc.
Ashburn, Virginia

Docket No. 030-35002
License No. 45-25467-01

During an NRC inspection conducted on December 1, 2016, with continuing in-office review through February 14, 2017, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 19 of NRC License No. 45-25467-01 requires, except as specifically provided otherwise in the license, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the application dated February 25, 2009. The U.S. Nuclear Regulatory Commission's shall govern unless the statements, representations, and procedures in the licensee's application correspondence are more restrictive than the regulations.

Item 10, "Radiation Safety Program" of the application dated February 25, 2009, requires that the Radiation Safety Officer review reports of personnel exposures in a timely manner.

Contrary to the above, as of December 1, 2016, the Radiation Safety Officer did not review reports of personnel exposures in a timely manner. Specifically, the Radiation Safety Officer informed the inspector that he had asked the dosimetry processor to reevaluate the dosimeter and spoke with one individual with unusually high exposures (396 millirem for the period October 2015 to January 2016), but not with a second individual who had left the employ of the company (297 millirem for the period July 2014 to October 2014) without resolving the exposures.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

Pursuant to the provisions of 10 CFR 2.201, GeoConcepts Engineering, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated This 10th day of March 2017