

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Castle Rock Geotechnical Engineering, Inc. 1114 E. Babcock Street Bozeman, Montana 59715 Location Inspected: same as above REPORT NO: 030-37201/2017-001		2. NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission - Region IV 1600 East Lamar Boulevard Arlington, Texas 76011-4511	
3. DOCKET NUMBER 030-37201	4. LICENSE NUMBER 25-29229-01	5. DATES OF INSPECTION 3/14/2017	

LICENSEE:
 The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

1. Based on the inspection findings, no violations were identified.
2. Previous violation(s) closed.
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Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

- X 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

10 CFR 71.5(a) requires, in part, that each licensee who transports licensed material outside the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the U.S. Department of Transportation regulations in 49 CFR Parts 107, 171 through 180, and 390 through 397, appropriate to the mode of transport.

49 CFR 172.704(c)(2) requires, in part, that a hazmat employee must receive the training required by 49 CFR Part 172, Subpart H, at least once every three years.

Contrary to the above, from March 23, 2015 to March 14, 2017, the licensee failed to provide a hazmat employee the training required by 49 CFR Part 172, Subpart H, at least once every three years. Specifically, between March 23, 2015 and March 14, 2017, a licensee employee transported Class 7 (radioactive) material on multiple occasions outside the site of usage, as specified in the NRC license, and the employee last received the required training on March 23, 2012, a period greater than three years. **[Continued on 591M Part 2]**

Licensee's Statement of Corrective Actions for Item 4, above.

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Janine F. Katanic, PhD, CHP	<i>Janine F. Katanic</i>	3/24/2017
BRANCH CHIEF	Vivian Campbell	<i>Vivian H. Campbell</i>	4/13/17

Non-Public
 Sensitive - Security-Related
 Public
 Non-Sensitive

Katanic, Janine

From: Katanic, Janine
Sent: Friday, March 24, 2017 12:00 PM
To: 'Andrew Pilskalns'
Subject: NRC Inspection Report 030-37201/2017-001
Attachments: NRC IR 030 37201 2017 001.pdf

Hi Andrew,

Thank you for sending your certificate for the US DOT Hazmat training that you completed on March 21, 2017. As discussed during the inspection, the violation is being documented on an NRC Form 591M rather than in a Notice of Violation. I have attached the NRC Form 591M documenting the results of the inspection. The violation is documented on the form along with your corrective actions. If this form accurately describes your corrective actions, please print your name, sign, and date the form in the area that says "Licensee's Representative." It can be scanned (please scan both pages) and returned to me in an email. That action will conclude the inspection. If the form does not correctly describe your corrective actions, let me know.

Also as discussed during the inspection, you might consider enhancing your annual radiation safety program review. A more comprehensive review may help you to identify and correct any issues such as the one noted above. NUREG-1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses" can be viewed here:

<https://www.nrc.gov/docs/ML1617/ML16175A375.pdf> Appendix E of the subject NUREG provides an example portable gauge audit checklist that you may find helpful. Please let me know if you have any questions.

Regards,
Janine

Janine F. Katanic, PhD, CHP
Senior Health Physicist
US Nuclear Regulatory Commission
Region IV
Division of Nuclear Materials Safety
office: 817-200-1151
email: Janine.Katanic@nrc.gov

Katanic, Janine

From: Andrew Pilskalns <ap.castlerock@gmail.com>
Sent: Monday, March 27, 2017 11:43 AM
To: Katanic, Janine
Subject: [External_Sender] RE: NRC Inspection Report 030-37201/2017-001
Attachments: SCAN0007.PDF; SCAN0008.PDF; SCAN0006.PDF

Follow Up Flag: Follow up
Flag Status: Flagged

Ms. Katanic,

Attached is the scans of the signed inspection Report. Thank you. We appreciate your assistance.

Sincerely,
ANDREW PILSKALNS, P.E.



1114 East Babcock
Bozeman, Montana
59715

Ph: (406)-586-9533
Cell: (406)-539-8439

ap.castlerock@gmail.com
www.castlerocker.com

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3. DOCKET NUMBER 030-37201	4. LICENSE NUMBER 25-29229-01		

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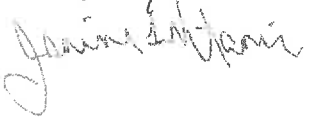
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NRC INSPECTOR	Janine F. Katanic, PhD, CHP		3/24/2017
BRANCH CHIEF	Vivian Campbell		

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CONTINUED FROM PART 1

This is a Severity Level IV violation. (Section 6.8.d.)

As an immediate corrective action, on March 14, 2017, the owner/Radiation Safety Officer/sole employee suspended any transportation of Class 7 (radioactive) material (portable gauge). On March 21, 2017, the individual completed training that satisfied the training requirements of 49 CFR 172, Subpart H. The individual has set up a reminder in his log book to prevent recurrence of the violation.