



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

June 28, 2017

Mr. Thomas Grashaw
Radiation Safety Officer
Allied Inspection Services
P.O. Box 268
St. Clair, MI 48079

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03015055/2017001(DNMS) AND
NOTICE OF VIOLATION – ALLIED INSPECTION SERVICES

Dear Mr. Grashaw:

On May 4, 2017, an inspector from the U.S. Nuclear Regulatory Commission (NRC) conducted a routine inspection at your facility in St. Clair, Michigan, with continued in-office review through June 5, 2017. The purpose of the inspection was to review activities performed under your NRC license to ensure that activities were being performed in accordance with NRC requirements. The in-office review included a review of review of field audit reports not available during the on-site inspection. Mr. Edward Harvey of my staff conducted a final exit meeting by telephone with you on June 5, 2017 to discuss the inspection findings. This letter and its enclosures present the results of the inspection.

During this inspection, the NRC staff examined activities conducted under your license related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations, as well as the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that Severity Level IV violations of NRC requirements occurred. The violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. One safety-related violation involving the failure to provide annual refresher safety training to two individuals, as required by Title 10 of the *Code of Federal Regulations* (CFR) Section 34.43(d), was identified by the inspector and is being cited in the enclosed Notice of Violation (Enclosure 1). Details of the violation, as well as the corrective actions that have been taken to restore compliance, are discussed in the enclosed inspection record (Enclosure 3).

The other violations are of a security-related nature and are cited in the enclosed, non-public Notice of Violation (Enclosure 2). The violations are being cited in Enclosure 2 because they

**Enclosures 2 and 4 contain Sensitive Unclassified
Non-Safeguards Information. When separated from
Enclosures 2 and 4, this transmittal letter and
Enclosures 1 and 3 are decontrolled.**

T. Grshaw

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were identified by the inspector. Details of the violations, as well as the corrective actions that have been taken to restore compliance, are discussed in the enclosed, non-public Security Addendum to the inspection record (Enclosure 4).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was or will be achieved is already adequately addressed on the docket in this letter and its enclosures. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notices of Violation.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, Enclosures 1 and 3, and your response to any of these documents should you choose to provide one will be made available electronically 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's website at <http://www.nrc.gov/reading-rm/adams.html>. However, Enclosures 2 and 4 will not be made available electronically for public inspection because they contain security-related information. If you choose to respond to the information in Enclosures 2 or 4, please mark the top of each page with "Security-Related Information – Withhold Under 10 CFR 2.390".

Please feel free to contact Mr. Harvey if you have any questions regarding this inspection. Mr. Harvey can be reached at 630-829-9819.

Sincerely,

/RA/

Aaron T. McCraw, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 030-15055
License No. 21-18428-01

Enclosures:

1. Notice of Violation
2. Notice of Violation (Non-Public)
3. IR 03015055/2017001(DNMS)
4. Security Addendum (Non-Public)

cc w/o encl: State of Michigan

T. Grashaw

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Letter to Thomas Grashaw from Aaron McCraw dated June 28, 2017

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03015055/2017001(DNMS) AND
NOTICE OF VIOLATION – ALLIED INSPECTION SERVICES

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NOTICE OF VIOLATION

Allied Inspection Services
St. Clair, Michigan

License No. 21-18428-01
Docket No. 030-15055

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted on May 4, 2017, with continued in-office review through June 5, 2017, one violations of NRC safety requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

Title 10 of the *Code of Federal Regulations* (CFR) Section 34.43(d) requires that the licensee provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.

Contrary to the above, as of May 4, 2017, the licensee failed to provide annual refresher safety training for a radiographer and a radiographer's assistant. Specifically, the licensee last provided annual refresher safety training for these individuals in October 2015, a period exceeding 12 months.

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

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved, is already adequately addressed on the docket. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, IR 03015055/2017001(DNMS)" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region III, within 30 days of the date of the letter transmitting this Notice.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond to this Notice of Violation, your response will be made available electronically 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's 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 publicly available without redaction.

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

Dated this 28th day of June, 2017.

Enclosures 2 and 4 contain Sensitive Unclassified Non-Safeguards Information. When separated from Enclosures 2 and 4, this transmittal letter and Enclosures 1 and 3 are decontrolled.

Enclosure 1

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

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

No license amendments or program changes have occurred since the last inspection.

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee was on 07/14/2016. No violations of NRC requirements were identified.

3. INCIDENT/EVENT HISTORY:

No open items or events have occurred since the last routine inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

Allied Inspection Services is authorized under NRC Materials License No. 21-18428-01 to use licensed material for industrial radiography. Licensed material is authorized to be used at the licensee's facility in St. Clair, Michigan, and at temporary job sites within NRC jurisdiction. At the time of the inspection, the licensee possessed one QSA Model 880 Delta radiographic exposure device (RED) that was used less than once a month since the last inspection. The licensee employed one radiographer and one radiographer's assistant that performed radiographic operations, as needed.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87121

Focus Areas Evaluated: All

At the time of the inspection, there was no work being performed at temporary job sites. The inspector toured the licensee's facility to evaluate the licensee's measures for material security, hazard communication, and exposure control. The inspector reviewed aspects of the licensee's radiation protection program, which included the security of licensed material, field audits of the radiographer and assistant, radiation worker training, survey instrument calibration, leak testing of sealed sources, labeling of containers, and postings.

Through interviews with the RSO, the inspector found that the licensee was knowledgeable and conscientious of radiation protection principles and licensee procedures for use, storage, and transportation of the RED. The RSO also demonstrated adequate knowledge of emergency response in the event of a source disconnect when explaining the licensee's emergency procedures to the inspector.

The inspector reviewed records of leak tests, source exchanges, dosimetry, shipping papers, utilization logs, and equipment calibrations with no issues noted.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a Canberra UltraRadiac Model MRAD213 survey instrument, the inspector performed independent measurements around the licensee's RED storage facility and observed no readings that would indicate exposures to members of the public in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

During this inspection, the inspector identified one safety-related violation of NRC requirements, as discussed below:

Title 10 of the *Code of Federal Regulations* (CFR) Section 34.43(d) requires that the licensee provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.

Contrary to the above, as of May 4, 2017, the licensee failed to provide annual refresher safety training for a radiographer and a radiographer's assistant. Specifically, the licensee last provided annual refresher safety training for these individuals in October 2015, a period exceeding 12 months.

The root cause of this violation was a management oversight of the licensee's training program. As immediate corrective action, the licensee provided annual refresher safety training on May 5, 2017. As corrective action to prevent recurrence, the licensee committed to creating a calendar reminder to ensure timely completion of future refresher training.

The inspector also identified security-related violations, which are described in the security addendum to this inspection record.

5. PERSONNEL CONTACTED:

Thomas Grshaw, RSO

Attended exit meeting on June 5, 2017.