



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

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

November 2, 2017

MISTRAS REACTIVE INSPECTION CHARTER

This reactive inspection is chartered to assess the circumstances surrounding the licensee's 30-day written report of a radiation worker (radiographer) receiving a dose in excess of the occupational dose limits of Title 10 of the *Code of Federal Regulations* (CFR) Section 20.1201 and potential willfulness of actions that led to the overexposure. The reactive inspection will be conducted in accordance with Inspection Manual Chapter 1301, "Response to Radioactive Material Incidents That Do Not Require Activation of The NRC Incident Response Plan" and Inspection Procedure 87103, "Inspection of Material Licensees Involved in an Incident or Bankruptcy Filing." The reactive inspection will include, but not be limited to, the items listed below. This charter may be revised based on the results and findings of the inspection.

1. Establish a historical sequence of events related specifically to the incident that caused the radiographer to exceed the annual occupational dose limit. (Ongoing)
2. Inspect the temporary jobsite to evaluate any potential exposures to members of the public or others in the vicinity of the radiographic operations, gain a better (visual) understanding of the work area where the incident occurred, and collect additional data pertinent to the case. (Completed on October 24, 2017)
3. Interview licensee staff (current and former) with Office of Investigations assistance. (Initial interview of radiographer expected to be completed on November 6, 2017; other licensee staff TBD)
4. Evaluate the licensee's dose estimate for licensee staff (current and former) and others, as applicable, based on information obtained during the temporary jobsite inspection and interviews with select individuals. (Ongoing)
5. Determine the extent of condition (i.e., has radiographer performed similar self-radiographs in the past?, is there a licensee culture that allows or promotes this activity?, are there any indications that other radiographers may be doing such activity?, etc.). (Ongoing)
6. Evaluate the need for additional NRC or external resources, such as medical, dosimetry, or radiography experts, to gain a better understanding of the facts and circumstances. (TBD)
7. Review the licensee's compliance with regulatory requirements with respect to the license, 10 CFR 20 dose limits and notifications, 10 CFR Part 30, and 10 CFR Part 34. (Ongoing)
8. Review any corrective actions taken by the licensee to prevent recurrence of a similar incident and to restore compliance and prevent recurrence of any identified violations. (Ongoing)

Additional Inspection Requirements

Determine if there are any lessons learned from this reactive inspection.

Docket No. 030-35114
License No. 12-16559-02

Charter Approval

John B. Giessner, Director
Division of Nuclear Materials Safety

/RA/
Signature

November 2, 2017
Date

DISTRIBUTION:

Cynthia Pederson

Kenneth O'Brien

Daniel Collins

Christine Lipa

Materials Inspection Branch

ADAMS Accession Number: ML17306B193

OFFICE	RIII DNMS		RIII DNMS				
NAME	AMcCraw:rj		JGiessner				
DATE	11/02/17		11/02/17				

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