



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION IV  
1600 E. LAMAR BLVD.  
ARLINGTON, TX 76011-4511

May 1, 2018

Jared Mortensen  
Radiation Safety Officer  
Skyview Testing Inc.  
4262 W 5600 S  
Roy, Utah 84067

SUBJECT: NRC INSPECTION REPORT 150-00043/2018-001 AND UNRESOLVED ITEM

Dear Mr. Mortensen:

This letter refers to the unannounced inspection conducted by the U.S. Nuclear Regulatory Commission, on April 4, 2018, at a temporary job site in Boise, Idaho. The inspection was an examination of activities conducted under your general license, which was granted under Title 10 of the *Code of Federal Regulations* (CFR) 150.20, "Recognition of Agreement State licenses," to ensure that activities were being performed in accordance with the NRC rules and requirements and in a manner that ensured protection of public health and safety. Within these areas, the inspection consisted of selected examination procedures and representative records, observations of activities, and interviews with personnel. Skyview Testing Inc. was granted a general license, as noted above, to conduct the same activities authorized under its State of Utah license, in areas of exclusive Federal jurisdiction during Calendar Year 2018 for a period not to exceed 180 days.

The inspector discussed the preliminary inspection findings with members of your staff at the conclusion of the on-site portion of the inspection on April 4, 2018, and later with you on April 5, 2018. A final telephonic exit briefing was conducted with you on April 18, 2018.

Based on the results of this inspection, the NRC identified one unresolved item regarding the use of Direct Ion Storage dosimetry devices (Mirion Instadose) to satisfy the regulatory requirements in 10 CFR Part 34 for personnel monitoring during radiographic operations. The unresolved item is described in the enclosed Inspection Report. The NRC will continue to review this unresolved item and you will be advised by separate correspondence of the results of our deliberation on this matter. Please be advised that the number and characterization of the issues described in the inspection report may change as a result of further NRC review. Because this item remains under NRC review, you are not required to respond to this matter at this time. However, if you choose to respond, and Security-Related Information is necessary to provide an acceptable response, please mark your entire response Security-Related Information in accordance with 10 CFR 2.390(d)(1) and follow the instructions for withholding in 10 CFR 2.390(b)(1). In accordance with 10 CFR 2.390(b)(1)(ii), the NRC is waiving the affidavit requirements for your response.

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

Should you have any questions regarding this letter of the enclosed report, please contact Jason vonEhr at 817-200-1186, or the undersigned at 817-200-1455

Sincerely,

*/RA/*

Michael C. Hay, Chief  
Materials Licensing and Inspection Branch  
Division of Nuclear Materials Safety

Docket: 150-00043  
License: 10 CFR 150.20

Enclosure:  
NRC Inspection Report 150-00043/2018-001

cc w/enclosure:  
State of Idaho Radiation Program Director  
State of Utah Radiation Program Director

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Docket: 150-00043

License: General License under 10 CFR 150.20

Report: 2018-001

EA No.: N/A

Licensee: Skyview Testing Inc.

Location Inspected: 8000 South Federal Way,  
Boise, ID

Inspection Date: April 4, 2018

Exit Meeting Date: April 18, 2018

Inspector: Jason E. vonEhr, Health Physicist  
Materials Licensing and Inspection Branch  
Division of Nuclear Materials Safety

Approved By: Michael C. Hay, Chief  
Materials Licensing and Inspection Branch  
Division of Nuclear Materials Safety

Attachment: Supplemental Inspection Information

Enclosure

## EXECUTIVE SUMMARY

### Skyview Testing Inc. NRC Inspection Report No. 150-00043/2018-001

This was an unannounced inspection performed on April 4, 2018, with a State of Utah licensee working under reciprocity at a temporary job site in Boise, Idaho. Skyview Testing Inc. is authorized under a NRC general license, which was granted under Title 10 of the *Code of Federal Regulations* (CFR) 150.20, "Recognition of Agreement State licenses," to conduct the same activities authorized under its State of Utah license in areas of exclusive Federal jurisdiction during Calendar Year 2018 for a period not to exceed 180 days. The scope of the inspection was limited to a review of the licensee's implementation of its radiation safety program and security program for the NRC licensed activities conducted at temporary job sites in the NRC jurisdiction.

The inspection identified one unresolved item regarding the licensee's use of Direct Ion Storage dosimeter devices (Mirion Instadose) to satisfy the regulatory requirements of 10 CFR Part 34 for personnel monitoring during radiographic operations.

The unresolved item remains under NRC review.

## REPORT DETAILS

### **1. Program Overview (87121 & 87137)**

#### **1.1. Inspection Scope**

This was an unannounced inspection of Skyview Testing Inc. The inspection was performed at a temporary job site located at the Micron Plant in Boise, Idaho at 8000 South Federal Way, on April 4, 2018. The licensee was authorized under a NRC general license, which was granted under Title 10 of the *Code of Federal Regulations* (CFR) 150.20, "Recognition of Agreement State licenses," to conduct the same activities authorized under its State of Utah license in areas of exclusive Federal jurisdiction during Calendar Year 2018 for a period not to exceed 180 days. The State of Utah license authorized the use of byproduct material for industrial radiography.

The licensee's crew on the day of the inspection consisted of one radiographer and two radiographer's assistants, and utilized a single QSA 880 Delta radiography camera. The scope of the inspection was limited to the NRC licensed activities occurring at the temporary job site in Boise on April 5, 2018. The inspection consisted of interviews with the radiography crew, a telephonic interview with the Radiation Safety Officer (RSO), a selected examination of procedures and representative records, and observations of industrial radiographic activities. The inspection also included a review of records and activities related to the licensee's compliance with access authorization and physical security requirements in 10 CFR Part 37 for activities and personnel at the Boise, Idaho temporary job site. No violations related to 10 CFR Part 37 were identified. One inspection finding related to the NRC's health and safety requirements was identified as an unresolved item and is discussed in Section 2.

### **2. Personnel Monitoring (87121)**

#### **2.1. Inspection Scope**

On April 4, 2018, the inspector observed and reviewed the licensee's use of personnel monitoring devices at the Boise, Idaho temporary job site. The inspector interviewed the on-site radiography crew and the RSO and examined a selection of representative records related to the licensee's use of personnel monitoring devices, which included licensee procedures and records at the Boise, Idaho temporary job site.

#### **2.2. Observations and Findings**

Title 10 CFR 34.47(a) states, in part, that the licensee may not permit any individual to act as a radiographer or a radiographer's assistant unless, at all times during radiographic operations, each individual wears, on the trunk of the body, a personnel dosimeter that is processed and evaluated by an accredited National Voluntary Laboratory Accreditation Program (NVLAP) processor.

The inspector found that the Skyview Testing Inc. radiographic crew at the Boise, Idaho temporary job site did not utilize traditional Optically Stimulated Luminescence (OSL) or Thermoluminescent Dosimeters (TLD), but were instead using another type of dosimeter, called Direct Ion Storage (DIS) dosimeters. Specifically, these personnel

were using Mirion Instadose dosimeters. These dosimeters are designed such that the individual's radiation exposure data from the dosimeter can be determined using a software interface on a local computer rather than requiring that the dosimeter be physically returned to a dosimetry processor to extract the data from the dosimeter. The Skyview Testing Inc. personnel utilizing the Mirion Instadose dosimeters were based out of the licensee's facilities in Utah, and traveled to the Boise, Idaho temporary job site to perform the NRC licensed activities.

The radiographic crew explained that each Instadose dosimeter was assigned to an individual, and the dosimeters were "read" on a regular, usually monthly, basis. The dosimeters are read by attaching the dosimeter to a USB port attached to the computer. All readings are date and time stamped and maintained in each individual's dose history. The radiation exposure data from the dosimeter was then used as the dose of record for the monitored individuals. A self-diagnostic is performed on the dosimeter each time that it is read and can identify errors or malfunctions.

At the conclusion of the onsite portion of the inspection, the inspector explained to the radiographic crew and later to the RSO that the NRC was in the process of evaluating DIS technology such as Mirion Instadose as it relates to compliance with the requirements for personnel monitoring in 10 CFR Part 34. After this matter was discussed with the RSO, the licensee decided that until the issue was resolved by the NRC, traditional OSL or TLDs for dosimetry would be issued to any personnel who will perform licensed activities in areas of the NRC's jurisdiction, such as Idaho. The use of Mirion Instadose dosimeters relative to the NRC's regulatory requirements in 10 CFR Part 34 is an unresolved item, which remains under the NRC review.

### 2.3. Conclusions

The inspection identified one unresolved item regarding the licensee's use of DIS dosimeter devices (Mirion Instadose) to satisfy the regulatory requirements in 10 CFR Part 34 for personnel monitoring during radiographic operations.

### 3. **Exit Meeting Summary**

The NRC inspector presented the preliminary inspection findings following the conclusion of the onsite inspection on April 5, 2018. On April 18, 2018, a final telephonic exit briefing that included a discussion of the unresolved item was conducted with Mr. Jared Mortensen, RSO. The licensee acknowledged the findings and did not dispute any of the details presented during the exit call.

**SUPPLEMENTAL INSPECTION INFORMATION**  
**PARTIAL LIST OF PERSONS CONTACTED**

Jared Mortensen, Radiation Safety Officer  
Matt Mueller, Radiographer  
Wade Garn, Radiographer's Assistant  
Matt Corbett, Radiographer's Assistant  
Saul Revera, GBI (Skyview Testing Client) contact

**INSPECTION PROCEDURES USED**

87121            Industrial Radiography Programs  
87137            10 CFR Part 37 Materials Security Programs

**ITEMS OPENED, CLOSED, AND DISCUSSED**

OPENED

None

CLOSED

None

DISCUSSED

150-00043/2018-001	Unresolved Item	The use of Direct Ion Storage Devices (Mirion Instadose) relative to 10 CFR Part 34 is an unresolved item, which remains under NRC review.
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**LIST OF ACRONYMS AND ABBREVIATIONS USED**

ADAMS	Agencywide Document Access and Management System
CFR	<i>Code of Federal Regulations</i>
DIS	Direct Ion Storage
NRC	Nuclear Regulatory Commission
NVLAP	National Voluntary Laboratory Accreditation Program
OSL	Optically Stimulated Luminescence
TLD	Thermoluminescent dosimeter
RSO	Radiation Safety Officer

NRC INSPECTION REPORT 150-00043/2018-001 AND UNRESOLVED ITEM - DATED  
MAY 1, 2018

**DISTRIBUTION:**

S. Morris, ORA  
T. Pruett, D/DNMS  
R4DNMS\_MLIB

ADAMS ACCESSION NUMBER: ML18109A565

SUNSI Review      ADAMS:       Non-Publicly Available       Non-Sensitive      Keyword:  
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