

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Allstate Consultants, LLC 3312 LeMone Industrial Boulevard Columbia, MO 65201 REPORT NUMBER(S) 2018001		2. NRC/REGIONAL OFFICE Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352
3. DOCKET NUMBER(S) 030-36267	4. LICENSE NUMBER(S) 24-32454-01	5. DATE(S) OF INSPECTION 5/18/18, with continued in-office review through 5/23/18

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.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

Non-cited violation(s) were discussed involving the following requirement(s):

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

(Violations and Corrective Actions)

10 CFR 30.34(c) requires, in part, that each licensee confine his possession and use of byproduct materials to the locations and purposes authorized by the license. Condition 10 of Amendment No. 02 of NRC License No. 24-32454-01 requires that licensed material be used or stored only at 3312 LeMone Industrial Boulevard, Columbia, Missouri and at temporary job sites of the licensee anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material.

Contrary to the above, on several occasions since 2003 through May 22, 2018, the licensee possessed at least one CPN International, Inc. Model No. MC Series Portaprobe containing approximately 10 millicuries (mCi) of cesium-137 and 50 mCi of americium-241/beryllium, and the Portaprobes were stored at and dispatched from (Continued on Part 2)

Statement of Corrective Actions

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	William A. Barrow, RSO	<i>William A. Barrow, RSO</i>	5/31/18
NRC INSPECTOR	Robert G. Gattone, Jr.	<i>Robert G. Gattone, Jr.</i>	5/31/18
BRANCH CHIEF	Aaron T. McCraw	<i>[Signature]</i>	5/31/18

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Allstate Consultants, LLC
3312 LeMone Industrial Boulevard
Columbia, MO 65201

REPORT NUMBER(S) 2018001

2. NRC/REGIONAL OFFICE

Region III
U. S. Nuclear Regulatory Commission
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

3. DOCKET NUMBER(S)

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5. DATE(S) OF INSPECTION

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(Continued)

an office at 30601 Highway 5, Marceline, Missouri 64658 to temporary jobsites in NRC jurisdiction.

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

As corrective action to prevent a similar violation, on May 22, 2018, the licensee removed licensed material from the aforementioned Marceline office and transferred the licensed material to the Columbia, Missouri office, an authorized location on the license. In addition, the licensee submitted a license amendment request to add the Marceline office to Condition 10 of the license, and the licensee committed to not possess licensed material at the Marceline office until the license is amended to authorize possession of licensed material at that office. The licensee also committed to request a license amendment to add future locations in Condition 10 of the license, and licensed material will not be possessed at any new locations until that location is authorized on the license.

Docket File Information

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<p>6. INSPECTION PROCEDURES USED</p> <p>87124</p>	<p>7. INSPECTION FOCUS AREAS</p> <p>All</p>
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SUPPLEMENTAL INSPECTION INFORMATION

<p>1. PROGRAM CODE(S)</p> <p>03121</p>	<p>2. PRIORITY</p> <p>5</p>	<p>3. LICENSEE CONTACT</p> <p>William Barrow, RSO</p>	<p>4. TELEPHONE NUMBER</p> <p>(573) 875-8799</p>
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Main Office Inspection Next Inspection Date: 04/18/2023

Field Office Inspection _____

Temporary Job Site Inspection 12721 S. Highway 36, Ashland, MO

PROGRAM SCOPE

This was an unannounced routine inspection of a portable gauge licensee. At the time of the inspection, the licensee had five CPN International, Inc. Model No. MC Series Portaprobos (portable gauges). The licensee's work hours were 8:00am to 5:00pm Monday through Friday from March through October. There were 4 authorized users (AUs) who used the gauges for measuring physical properties of materials in NRC jurisdiction.

Performance Observations

The inspector: (1) observed that the portable gauges were secured at the licensee's Columbia, MO facility as required by 10 CFR 30.34(i); (2) observed an AU secure a gauge in an open bed pickup truck at a temporary jobsite as required by 10 CFR 30.34(i); (3) noted that the AU wore her whole body dosimeter badge; (4) noted that the gauge case was marked and labeled; (5) used an NRC-owned, calibrated survey meter to conduct an independent ambient exposure rate survey near the cesium-137 shutter and the result was 23 milliRoentgen per hour (mR/hr) that was less than the applicable ambient exposure rate stated in the Sealed Source Device Registry document for the CPN International, Inc. Model No. MC Series Portaprobos; (6) observed the AU demonstrate how she would respond to a vehicle accident involving gauge damage based on a scenario posed by the inspector; (7) observed that the cesium-137 (Cs-137) source rod was locked in the shielded position; (8) noted that the licensee did not remove gauge sources; (9) noted that the licensee cleaned the Cs-137 source shutter periodically; (10) reviewed the licensee's emergency procedure; (11) observed the AU conduct safe density and moisture tests with the gauge at the temporary jobsite; (12) observed that the licensee possessed an S.E. International, Inc. Model Radiation Alert Monitor 4 survey meter; (13) reviewed dosimetry badge records and noted that the highest annual whole body dose for 2013 through April 4, 2018 was 197 millirem; and (14) noted that there was no loss, theft, flood, damage, or fires involving licensed material.

One violation was identified, as documented in Parts 1 and 2.