UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

September 27, 2018

Mr. Russell Allan Phillips
Radiation Safety Officer
Intertek Asset Integrity Management, Inc.
P.O. Box 1536
Morgan City, LA 70381-1536

SUBJECT: NRC INSPECTION 030-37816/2018-001 AND NOTICE OF VIOLATION

Dear Mr. Phillips:

This letter refers to the announced inspection conducted on July 18, 2018, at your facility in Longview, Texas. The inspection was an examination of activities conducted under your license as they relate to public health and safety, to confirm compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules, regulations, and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, and interviews with personnel. The preliminary inspection findings were discussed with you at the conclusion of the onsite portion of the inspection on July 18, 2018. A final telephonic exit briefing was conducted with you on September 19, 2018.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy, which can be found at the NRC's Web site at http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The violation is cited and described in the enclosed Notice of Violation (Notice). The violation involved the failure to ensure that alarm ratemeters used in industrial radiography require a special means to change the preset alarm function.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful in preparing your response. You can find the Information Notice on the NRC website at: http://pbadupws.nrc.gov/docs/ML0612/ML061240509.pdf. 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 will be (was) achieved should be addressed. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, please provide a bracketed copy of your response that identifies the information that should be protected and a

redacted copy of your response that deletes such information. If you request withholding of such information, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by Title 10 of the Code of Federal Regulations (CFR) 2.390(b) to support a request for withholding confidential commercial or financial information).

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, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

Should you have any questions regarding this letter or the enclosed Notice, 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: 030-37816
License: 17-29308-01

Enclosure:
Notice of Violation (Notice)

cc:
State of Louisiana Radiation Program Director
State of Texas Radiation Program Director

NRC INSPECTION 030-37816/2018-001 - DATED September 27, 2018

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☒SUNSI Review By: JEV	ADAMS: ☒ Yes ☐ No	☐ Non-Publicly Available ☒ Publicly Available	☒Non-Sensitive ☐ Sensitive	Keyword: NRC-002

OFFICE	DNMS:MLIB	C:MLIB				
NAME	JEvonEhr	MCHay				
SIGNATURE	*/RA/*	/RA/				
DATE	9/24/18	9/27/18				

OFFICAL RECORD COPY

NOTICE OF VIOLATION

Intertek Asset Integrity Management, Inc.
Morgan City, LA

Docket No. 030-37816
License No. 17-29308-01

During an NRC inspection conducted on July 18, 2018, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violations is listed below:

> 10 CFR 34.47(g)(3) requires, in part, that each alarm ratemeter used in industrial radiography must require special means to change the preset alarm function.
>
> Contrary to the above, from at least February 23 through July 18, 2018, the licensee failed to ensure that each alarm ratemeter used in industrial radiography required special means to change the preset alarm function. Specifically, in numerous instances dating back to at least February 23, 2018, and continuing through the date of the inspection, the licensee used, at an Ohio office that conducted work at temporary job sites in West Virginia, a digital dosimeter that the radiographer or radiographer's assistant could readily change the preset alarm function in the field.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.3.d)

Pursuant to the provisions of 10 CFR 2.201, Intertek Asset Integrity Management, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violations, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued requiring information as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

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, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents 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 not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you

request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

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

Dated this 27th day of September 2018