

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED: Island Roads Corporation 6501 Red Hook Plaza St. Thomas, USVI 00802		2. NRC/REGIONAL OFFICE  <b>U.S. Nuclear Regulatory Commission Region I, 2100 Renaissance Blvd, Suite 100 King of Prussia, Pennsylvania 19406-2713</b>	
REPORT NUMBER(S) 2018001			
3. DOCKET NUMBER(S) 03035038	4. LICENSE NUMBER(S) 55-25473-01	5. DATE(S) OF INSPECTION 09/21/2018 and 11/29/2018	

**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) and corrective action(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 the 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)

(Continued on Form 591M 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	Geoffrey Fleming Jr., Project Manager		10/20/18
NRC INSPECTOR	Leonardo Wardrobe, Health Physicist		12/14/2018
BRANCH CHIEF	Arthur Burritt, Branch Chief, CIRDA		12/20/18

\*NRC FORM 591M PART 1 (07-2012) (RI Rev. 09/12/2013) G:\WBL Documents\WBL Inspection Records\IR55-25473-01.2018001.591M-Part1.doc

SUNSI Review Completed By: / RA / L Wardrobe  Public  Non-Sensitive

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(Continued)

1. 10 CFR 20.1101(c) requires that the licensee periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, as of September 21, 2018, the licensee failed to periodically (at least annually) review the radiation protection program content and implementation. Specifically, the licensee did not review the program or perform an annual audit between October 20, 2016, and September 21, 2018. This is a repeat violation, though the audits were successfully performed in 2013 – 2016.

This is a Severity Level IV Violation (Enforcement Policy 6.3.d)

As corrective action, the RSO conducted a comprehensive audit in September 2018 covering the time period in question.

2. License Condition 21 of license number 55-25473-01 states, in part, that except as specifically provided otherwise in the license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed under License Condition 21.

In the letter dated September 29, 2009, referenced in License condition 21 of license number 55-25473-01, the licensee stated that either the licensee will maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or the licensee will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor (quarterly exchange).

Contrary to the above, as of September 21, 2018, the licensee failed to conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed under License Condition 21. Specifically, the licensee did not maintain, for inspection by NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR Part 20, or provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency (quarterly exchange) recommended by the processor from June 17, 2015 – September 21, 2018.

This is a Severity Level IV Violation (Enforcement Policy 6.3.d)

As corrective action, the licensee contracted a dosimetry provider to analyze the licensee's authorized users' doses at a frequency recommended by the processor.