

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED: Hannah & Associates, Inc. Dba Hannah Engineering P.O. Box 2058 Elkins WV 26241 REPORT NUMBER(S) 2019001		2. NRC/REGIONAL OFFICE U.S. Nuclear Regulatory Commission Region I, 2100 Renaissance Blvd, Suite 100 King of Prussia, Pennsylvania 19406-2713	
3. DOCKET NUMBER(S) 03038605	4. LICENSE NUMBER(S) 47-35034-01	5. DATE(S) OF INSPECTION 3/18-19/2019 & 4/23/2019	

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.

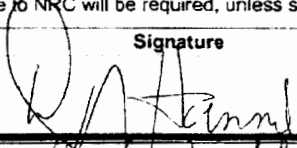
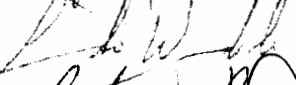

Non-cited violation(s) were discussed involving the following requirement(s) and corrective action(s):

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)

See continuation sheet.

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	Dewayne N. Hannah, RSO, President		4-29-2019
NRC INSPECTOR	Leonardo Wardrobe		4/25/2019
BRANCH CHIEF	Arthur Burritt		5/6/19

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

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(Continued)

1. 10 CFR 30.34(c) states in part that each person licensed by the Commission pursuant to the regulations in this part and parts 31 through 36 and 39 shall confine his possession and use of the byproduct material to the locations and purposes authorized in the license.

License Condition 10 of NRC License 47-35034-01 states in part that licensed material may be used or stored at the licensee's facilities located at 1121 Beverly Pike, Elkins, West Virginia.

Contrary to the above, the licensee failed to confine their possession and use of the byproduct material to the locations and purposes authorized in the license. Specifically, since July 20, 2015, the licensee stored byproduct material at a permanent storage facility located at 9605 Seneca Trail, Suite A, Lewisburg, West Virginia and this location was not listed on the license.

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

The licensee submitted a request to amend their license on April 23, 2019 to add the additional location of storage on their license. The licensee stated they will amend their license to add permanent storage locations on their license prior to storing portable gauges at those permanent storage location.

2. License Condition 19 of NRC License 47-35034-01 states in part that except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including and enclosures listed below.

In the Application dated January 7, 2013, Item 10, Radiation Safety Program – Occupational Dosimetry, it states in part that the licensee will maintain, for inspection by the 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 20, or the license will provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.

Contrary to the above, the licensee failed to maintain, for inspection by the 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 20, or provide dosimetry processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor. Specifically on March 18, 2019, the licensee failed to provide the 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 20, or provide dosimetry to their portable gauge users that are processed and evaluated by an NVLAP-approved processor that is exchanged at a frequency recommended by the processor.

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

The licensee stated that they documented on April 5, 2019, that unmonitored individuals are not likely to receive a radiation dose in excess of 10 percent of the allowable limits in 10 CFR 20 and they will maintain the documentation for future NRC inspection.