



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

September 20, 2019

Marshall Collingwood, CMT Manager
Legacy Engineering, Inc.
6424 Beach Boulevard
Jacksonville, FL 32216

**SUBJECT: LEGACY ENGINEERING, INC. - NRC INSPECTION NO. 15000009/2019006
AND NOTICE OF VIOLATION**

Dear Mr. Collingwood:

This letter refers to the limited inspection conducted from June 27, 2019 thru August 22, 2019, during a review of your reciprocity request submitted to the Region I Office. This inspection examined activities conducted under your general license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations. Within these areas, the inspection consisted of a selected examination of representative records regarding the days for which a reciprocity request was filed and the days for which a reciprocity request was required. The findings of the inspection were discussed with John E. Ellis, II of your staff and Steven Courtemanche of this office on August 22, 2019.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) because the violation was identified by the NRC.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket and include: Submission of a reciprocity request dated July 18, 2019, for the month of May 2019 and the licensee's commitment on July 18, 2019, to contact the Region I office if a signed reciprocity request is not received by the licensee prior to any proposed work in order to determine the status of the request. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding this matter, please contact Steven Courtemanche of my staff at (610) 337-5075 or via electronic mail at Steven.Courtemanche@nrc.gov.

M. Collingwood

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Thank you for your cooperation.

Sincerely,

/RA/

Anne DeFrancisco, Acting Chief
Commercial, Industrial, R&D,
and Academic Branch
Division of Nuclear Materials Safety
Region I

Docket No. 15000009
FL License No. 3662-1

Enclosure: Notice of Violation

cc w/ enclosure John E. Ellis, II, P.E., Radiation Safety Officer
State of Florida

LEGACY ENGINEERING, INC. - NRC INSPECTION NO. 15000009/2019006 AND NOTICE OF VIOLATION DATED SEPTEMBER 20, 2019

DISTRIBUTION:
R1 Enforcement

DOCUMENT NAME: G:\WBL Documents\WBL Inspection Letter\Legacy,2019006.docx ML19266A008

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OFFICE	RI:DNMS	RI:DNMS			
NAME	SCourtemanche/src	ADeFrancisco/aed			
DATE	09/20/19	09/20/19			

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Legacy Engineering, Inc.
Jacksonville, FL

Docket No. 15000009
FL License No. 3662-1

During an NRC inspection conducted from June 27, 2019 through August 22, 2019, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 150.20(b)(2) requires, in part, that any person engaging in activities in areas of exclusive Federal jurisdiction within Agreement States under the general licenses of this section shall file an amended NRC Form 241 or letter with the Regional Administrator to request approval for changes in work locations, radioactive material, or work activities different from the information contained on the initial NRC Form 241.

Contrary to the above, between May 1, 2019 and May 31, 2019, the licensee engaged in activities in areas of exclusive Federal jurisdiction within Agreement States under the general licenses of this section and did not file an amended NRC Form 241 or letter with the Regional Administrator to request approval for changes in work locations, radioactive materials, or work activities different from the information contained in the initial NRC Form 241. Specifically, the licensee engaged in activities at the Naval Air Station in Mayport, Florida, an area of exclusive Federal jurisdiction within an Agreement State, on days not specified by the initial NRC Form 241 without filing an amended NRC Form 241 until July 18, 2019.

This is a Severity Level IV violation (Enforcement Policy Section 6.9).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed on the docket. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Notice of Violation
Legacy Engineering, Inc.

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

Dated This 20th day of September 2019