

INSPECTION REPORT

SCOPE OF INSPECTION

The inspection assessed whether exports and imports were conducted in accordance with Title 10 of the *Code of Federal Regulations* (CFR) Part 110, "Export and Import of Nuclear Equipment and Material" and with the terms and conditions of specific licenses. The results of the inspection are summarized below.

ORGANIZATION AND SCOPE OF PROGRAM

ISOFLEX Radioactive, LLC (also known as ISORAD) is a small industrial radiography source distributor and U.S. Nuclear Regulatory Commission (NRC) licensee. ISOFLEX began its operations in late 2017. ISOFLEX is operated by two staff - Kevin Schehr, President and Radiation Safety Officer (RSO) and Tony Bustillo, Office Manager and Alternate RSO. ISOFLEX imports pre-fabricated radioactive sealed sources and exports the sealed sources to customers, as authorized under export licenses PXB215a.00, PXB215b.01, PXB224.00, PXB225.00). ISOFLEX is currently authorized to export to 186 countries. In 2018, ISOFLEX completed 24 shipments containing 52 sources. In 2019, ISOFLEX completed six shipments containing 39 sources. At the time of this inspection, no shipments had occurred since July 11, 2019. ISOFLEX had not yet supplied sealed sources to domestic users, but stated its goal is to enter the domestic market in market in 2020.

The ISOFLEX facility consists of 3,200 square feet of office space, with specific cubicles designated as shipping and receiving areas, work space areas for storing parts and assemblies, work areas for using hand tools, and a secure area surrounded by stacked concrete blocks in which to store radioactive sources. ISOFLEX does not manufacture sealed sources on the premises, and has no plans to.

From 2017 to about mid-2019, ISOFLEX had obtained their finished sealed sources from Gilligan Engineering Services (GES), a supplier located in the United Kingdom. In 2019, GES entered into an exclusive contract with QSA Global in Massachusetts and is no longer able to serve as ISOFLEX's supplier. However, ISOFLEX is working with a newly formed company in Houston, Texas named NDT Texas, LLC. NDT Texas, LLC will supply finished sealed sources exclusively to ISOFLEX.

IMPORT EXPORT AND INVENTORY CONTROL OF SEALED SOURCES

During the course of the inspection, the NRC inspectors reviewed records of the import of byproduct material, as authorized under the NRC general license for import of byproduct material in 10 CFR Part 110.27. The NRC staff brought copies of ISOFLEX's import and export Advanced Notifications of byproduct material submitted by ISOFLEX to the NRC as required of 10 CFR Part 110.50(c) to initiate the discussion and better understand some of the entries provided in their most recent notifications. Specifically, to confirm that ISOFLEX had stated the correct end use on their import notifications. As a result of the discussion, the NRC now understands how ISOFLEX's business functions, and understands why the information on the notification forms differs from other licensees in this industry.

FILES MANAGEMENT

The NRC staff examined and discussed the adequacy of measures taken by the licensee to ensure effective recordkeeping (including advanced notifications for imports and exports) and determined that imports and exports of radioactive sources are being conducted in accordance with the requirements contained in 10 CFR 110 and in conformance with the terms and conditions of specific licenses.

CONCLUSION

The NRC determined that the licensee currently maintains effective procedures for recordkeeping and has implemented adequate controls so that imports, exports and advanced notifications for all shipments are conducted in accordance with 10 CFR Part 110. The NRC determined that ISOFLEX management has adequately addressed all responsibilities associated with licensed activities.

LIST OF PERSONS CONTACTED

Kevin Schehr	President and Radiation Safety Officer
Tony Bustillo	Office Manager and Alternate Radiation Safety Officer