

From: [gordon finlay](#)
To: [VonEhr, Jason](#)
Subject: [External_Sender] RE: NRC Remote Inspection Findings
Date: Monday, June 08, 2020 9:47:02 AM

Jason,

Reply to Violations – 49 CFR 177.817(a) and 49 CFR 172.202(a)

QCI in House Radiation Tracking System Form 3 is a utilization of inspection, Dosimetry and Transportation Log Record.

These logs are filled in prior to and at the end of each Radiographic Operation and are available in case of Incident or Accident involving Radioactive Source. The DOT portion of this log record shows:

Number of Packages
Reportable Quantity
Radioactive Material Special Form Number
Radionuclide
Exemptions
GBq
Curries
Radioactive White or Yellow Number
Transport Index
Type B(u) Package Certification Number
Special Form Certificate Number
Type of Carrier used
Special Shipment Inspection Form
Survey before Transport
Survey after Transport

The list above are line items requiring the Radiographer to fill in the information. It was brought to our attention, the line item for Radioactive Special Form, QCI was using Past identification number from 49CFR172.101 Table UN 2974 not the Revised UN 2916.

The wrong UN 2974 number was used for QCI transporting vehicle to and from job site and was never involved in an accident or incident or submitted to any Agency other than QCI record keeping file.

All records of QCI's receiving or transferring Radioactive Materials, the correct special Form NOS 7 UN 2916 was used.

Corrective Actions for above Violations:

On May 7, 2020, QCI's Transportation Log Form Document Line Item corrected to UN 2916.

Reply to Notice of Violation 49CFR 172.203 (d) (3)

QCI's interpretation of 49CFR 172.203 – The activity may also be stated in an appropriate customary Unit (Curries) – meaning suitable or proper in the circumstances in lieu of international units (Becquerels).

Corrective Actions for above Violation:

As of May 9, 2020, QCI will report maximum activity in both Becquerels and Curies on QCI Transport Document.

In closing, should you have any questions regarding this reply please contact Gordon Finlay 208-863-6248.

Sincerely,

GFinlay (RSO)

Sent from [Mail](#) for Windows 10

From: [gordon finlay](#)
Sent: Friday, May 15, 2020 5:56 PM
To: [Tyler Finlay](#)
Subject: FW: NRC Remote Inspection Findings

Sent from [Mail](#) for Windows 10

From: [VonEhr, Jason](#)
Sent: Thursday, May 14, 2020 7:05 AM
To: [gordon finlay](#)
Subject: NRC Remote Inspection Findings

Gordon,

As we discussed on the phone on May 8, 2020, the remote inspection conducted between April 10, 2020, and the May 4, 2020, was completed and resulted in a SLIV violation involving the DOT shipping paper issues.

Please find attached the Notice of Violation for the inspection. The "ML" number at the end of the document title refers to the electronic address within the NRC's document library system "ADAMS." Please also note that the Notice of Violation requires a response in writing within 30 days; This is to ensure that your corrective actions are described on the docket. If you are in need of an extension of this due date, please reach out to me over email (preferred) or telephonically.

If you have questions or concerns about the NOV, the inspection, or other matters, please feel free to contact me.

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