



12/18/2020

Regional Administrator
United States Nuclear Regulatory Commission
Region IV
1600 E. Lamar Boulevard
Arlington, Texas 76011-4511

Subject: NRC Inspection Report and Notice of Violation
Versa Integrity Group, Inc. License No. 17-35243-01
Docket No. 030-38837

- A. 10 CFR 34.49© requires, in part, that the licensee shall conduct a survey of the radiographic exposure device with a calibrated radiation survey instrument whenever a radiographic exposure device is placed in a storage area to ensure that the sealed source is in its shielded position.

Response: Versa Integrity Group radiographers failed to record survey readings in the utilization logs multiple times between January and June 2020. This was a lack of oversight on Versa Integrity Groups management failed to verify that the utilization logs were filled out properly with the required surveys.

Corrective Action: Versa Integrity Group will retrain all radiographers through their annual Operating and Emergency refresher no later than December 31, 2020 on the proper way to fill out a utilization log and record the survey readings when checking out and returning a device. Versa Integrity Group has also appointed a Radiation Safety Officer designee to review and audit all utilization logs for inconsistencies.

- B. License Condition 20.A of NRC License 17-35243-01, Amendment 04, requires, in part, that the licensee shall conduct its program in accordance with the statements, representations and procedures contained in the license.

The License application received May 15, 2015, in the Basic Operating and Emergency Procedures, RAS008-NRC Revision A, Section 16.1.1, states that the radiographic exposure devices and storage containers, prior to being moved from one location to another and also prior to being secured at a given location, shall be locked and surveyed on all sides with an appropriate survey instrument to assure that the sealed source is in the shielded position.

Response: Versa Integrity Group's radiographer on February 24, 2020 failed to record the necessary surveys and failed to record them on their daily "Radiography Field Survey and Dosimetry Report".

Corrective Action: Versa Integrity Group will retrain all radiographers through their annual Operating and Emergency refresher no later than December 31, 2020 on the proper way to fill out the daily "Radiography Field Survey and Dosimetry Report", to include recording the



required surveys as outlined in Versa's Basic Operating and Emergency Procedures, RAS008-NRC Revision A, Sec. 16.1.1. Versa Integrity Group has also appointed a Radiation Safety Officer designee to review and audit all daily "Radiography Field Survey and Dosimetry Reports" for accuracy and inconsistencies.

- C. License condition 20.A of NRC License 17-35243-01, Amendment 04, requires, in part, that the licensee shall conduct its program in accordance with the statements, representations and procedures contained in the license. The License application received May 15, 2015, in the Basic Operating and Emergency Procedures, RAS008-NRC, Revision A, Section 18.4, states that radiographers are to make measurements at enough points on the boundaries to ensure that the restricted area is set up properly.

Response: Versa Integrity Groups radiographer on March 13, 2020 failed to record enough survey measurements on his boundary to ensure that the restricted area was set up properly as documented on the daily "Radiography Field Survey and Dosimetry Reports".

Corrective Action: Versa Integrity Group will retrain all radiographers through their annual Operating and Emergency refresher no later than December 31, 2020 on the proper way to fill out the daily "Radiography Field Survey and Dosimetry Report" to include recording all survey measurements at the most intense area of the boundary erected as outlined in Versa's Basic Operating and Emergency Procedures, RAS008-NRC Revision A. Section 18.4. Versa Integrity Group has also appointed a Radiation Safety Officer designee to review and audit all daily "Radiography Field Survey and Dosimetry Reports" for accuracy and inconsistencies.

- D. 10 CFR 34.101(c) requires, in part, that any licensee storing radioactive material at any location not listed on the license for a period in excess of 180 days in a calendar year shall notify the appropriate NRC regional office prior to exceeding the 180 days.

Response: Versa Integrity Group failed to notify the appropriate NRC regional office in writing that we would exceed the 180 days in a calendar year for storing radioactive material at a location not listed on the license in years 2019 and 2020.

Corrective Action: On November 18, 2020 Versa Integrity Group's Corporate Radiation Safety Officer sent in the appropriate notice of exceeding 180 days in year 2020. The notice was sent to NRC Region IV office via email. Versa's Corporate Radiation Safety Officer will have oversight on this notice and will ensure that the proper notification is sent not to exceed the 180 days in the calendar year 2021.

Regards,

A handwritten signature in blue ink, appearing to read "Mark J. Senette", is written over a faint, larger version of the same signature.

Mark J. Senette
Versa Integrity Group, Inc.
Corporate Radiation Safety Officer