



Materials Inspection Record

1. Licensee Name: NQS Inspection, Ltd.		2. Docket Number(s): 150-00042		3. License Number(s) TX-L06262	
4. Report Number(s): 2021-002			5. Date(s) of Inspection: June 25, 2021		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03320	8. Priority: 1	9. Inspection Guidance Used: 87121	
10. Licensee Contact Name(s): Rick Morano - RSO Mike Wilmoth - Regional Mgr.		11. Licensee E-mail Address: rmorano@nqsltd.com mwilmoth@nqsltd.com		12. Licensee Telephone Number(s): 361-885-7900 281-687-8571	
13. Inspection Type:		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input type="checkbox"/> Initial <input type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		<input type="checkbox"/> Main Office <input type="checkbox"/> Field Office <input checked="" type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		TBD <input type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input checked="" type="checkbox"/> No change	

16. Scope and Observations:

This was an unannounced inspection of a non-destructive testing company authorized by the State of Texas to use byproduct material for industrial radiography at facilities in Corpus Christi and Brownsville and at temporary job sites within Texas jurisdiction. The company conducted these activities at temporary job sites in NRC jurisdiction under the terms of a reciprocity request filed in December 2020 for calendar year 2021. The scope of this inspection was limited to an evaluation of licensed activities (radiographic testing) at Indeck Niles Energy Center, a 1000-MW combined-cycle natural gas plant under construction in Niles, Michigan.

The inspector toured the job site in Niles and interviewed the crew present. All areas were adequately posted, and all licensed material was adequately secured. Independent surveys in the vicinity of the source storage trailer were well below regulatory limits to members of the public. The crew was knowledgeable of radiation protection principles and licensee operating and emergency procedures. Since no licensed activities were ongoing at the time of the inspection on account of poor weather, the crew instead demonstrated equipment checks, restricted area setup and control, use of instruments and surveys, and response to abnormal conditions involving radiographic equipment. The inspector examined all radiographic equipment present on the job site; the camera was adequately labeled, all survey meters, direct reading dosimeters and alarming ratemeters were calibrated and functional, and overall the equipment appeared to be in good condition and adequately maintained.

The inspector reviewed utilization logs for all days of use in calendar year 2021, as well as sealed source and camera DU leak test results and equipment maintenance records. During this review of records, the inspector noted that the licensee had misunderstood the provisions of the general license for reciprocity and incorrectly believed that days in which it stored but did not use licensed material in NRC jurisdiction would not count towards the 180-day limit on licensed activities. The licensee believed therefore that it had only used 34 days of its reciprocity approval to date, and that it could continue to store licensed material for the remainder of the calendar year so long as it did not perform radiographic testing in more than 180 days. In fact it had already possessed and used material for 176 days under the terms of reciprocity, as the camera had been stored on-site since December 2020. After discussing the requirement in 10 CFR 150.20(b)(4) with the crew and with their management, the licensee decided to transport the camera to its facility in Louisville, Kentucky later that evening so as to retain the remaining four days of possession and use under reciprocity in 2021. The licensee provided confirmation of this shipment to the inspector, and discussed the matter with the client who offered to complete the two or three remaining welds requiring RT at the same time so as to ensure no more than four days of licensed activities would be needed in the remainder of 2021.

No violations of NRC requirements were identified as a result of this inspection.