



### Materials Inspection Record

1. Licensee Name: IRISNDT, Inc.		2. Docket Number(s): 030-38777		3. License Number(s) 13-32791-01	
4. Report Number(s): 2021-001			5. Date(s) of Inspection: June 1 through 10, 2021		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03320	8. Priority: 1	9. Inspection Guidance Used: 87121	
10. Licensee Contact Name(s): Kyle Ledbetter - RSO		11. Licensee E-mail Address: kyle.ledbetter@irisndt.com		12. Licensee Telephone Number(s): 219-923-9245	
13. Inspection Type:		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		<input type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input checked="" type="checkbox"/> Temporary Job Site <input checked="" type="checkbox"/> Remote		06/01/2022 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

**16. Scope and Observations:**

This was an announced hybrid inspection of a nondestructive testing company authorized to use sealed sources of byproduct material for industrial radiography and for measuring the physical properties of materials with portable gauges at field stations in Hammond, Indiana, and Taylor, Michigan, and at temporary job sites in NRC jurisdiction. At the time of the inspection, the licensee had nine radiography staff in Taylor. On average, one crew was dispatched daily to work at the Marathon Petroleum Refinery in Detroit and other local projects. The staff also performed occasional call-out work as far as Saginaw, Lansing, and Battle Creek. The licensee also had thirty-three radiography staff in Hammond. On average, two to three crews were dispatched daily to work at the BP Refinery in Whiting, Indiana. The staff in Hammond also performed call-out work in southwest Michigan. The licensee's RSO was based at the Hammond field station, assisted in his oversight of the Taylor field station by a site RSO.

The inspector began the inspection with a review of records via secure filesharing and interviews with the RSO and corporate RSO via video teleconference. The inspector reviewed program audits, radiation safety training records, quarterly camera maintenance documentation including DU leak test results, as well as personnel dosimetry reports, which recorded maximum annual whole-body doses of 1,809 mrem in 2020, and 668 mrem in 2021 through May.

On June 10, the inspector toured the field station in Taylor. All areas were adequately posted, and all material was adequately secured. Independent surveys in unrestricted areas were below regulatory limits to members of the public, while confirmatory surveys demonstrated the adequacy of licensee equipment and survey techniques. The inspector examined a selection of radiographic equipment; all appeared to be in good condition, and all exposure devices were properly labeled. The licensee had an adequate and appropriate selection of survey instruments and other dosimetry equipment on hand for radiography staff.

The inspector then met one of the licensee's crews at the Marathon Refinery in Detroit. The inspector observed the conduct of radiographic operations and noted adequate control of restricted areas, use of calibrated and operable survey and dosimetry equipment, and full control and constant surveillance of licensed material by the crew. Independent surveys at the perimeter of the restricted area were below regulatory limits to members of the public. The inspector also reviewed the crew's utilization logs, shipping papers and source certificate while on-site.

During a review of training records, the inspector noted that the licensee had identified that six of nine radiography staff in Taylor received refresher safety training at intervals exceeding 12 months. The six had last received this training in December 2019; the other three received this training in December 2020 while at other field stations.

## Materials Inspection Record (Continued)

Title 10 CFR 34.43(d) states that the licensee shall provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.

The failure to provide refresher safety training for six individuals within 12 months of December 2019 represents a Severity Level IV violation of 10 CFR 34.43(d) in accordance with NRC Enforcement Policy example 6.3.D.6. However, because (1) the licensee identified the violation, (2) corrected the violation in a reasonable period of time and took additional corrective actions to address the potential for recurrence, and (3) the violation was determined not to be repetitive or willful, the violation met the criteria in Section 2.3.2.B of the Policy to be considered a Non-Cited Violation.

The inspector determined that the root cause of the violation was an isolated instance of inadequate local oversight of the program by the site RSO at the time. As corrective action, the licensee provided the required training to all radiography staff in Taylor on May 26, 2021, and committed to provide enhanced oversight of this field station as necessary to ensure compliance with NRC requirements.