

RECEIVED  
OCT 07 2021

Reply to a Notice of Violation

DNMS

9/29/2021

As we spoke while you were on-site, the previous Lab manager left our company and did not provide any information to myself or others about what needs to be done for both AASHTO and for our NRC license.

Inspection Follow Up Response

- A) Leak tests for CY 2017 (all gauges) and any to fill the gaps between 2015 and 2021 for Gauges #1 (S/N34977) and #3 (S/N 37709)
- I was not able to track down any of the leak tests that were performed in 2017. I am certain that the leak tests were completed on the 2 gauges that were always completed (#2 and #4) but I was not able to locate the leak test certificate.
  - As we spoke about the leak tests for #1 and #3, the reminder that is sent to us yearly did not indicate that a leak test needed completed for those gauges, so none were done for those years. I did some research this past leak test reminder and determined that a leak test was needed for all gauges, yearly. A leak test was performed on all gauges on 03/17/2021 which you did see while you were on site.
  - JFC also intends to place an Outlook reminder in our company calendar which shows when leak tests need to be performed.
- B) The only inventory record that JFC had during this timeframe is a list of the entire labs inventory which includes the gauges. Moving forward, inventory will be taken when leak tests are completed. JFC also intends to place an Outlook reminder in our company calendar which shows when inventory is due.
- C) No audits had been completed prior to 8/19/2021. Moving forward, audits will be completed yearly and will be reminded by an outlook calendar. I have attached a completed one performed on 8/19/2021.
- D) Moving forward, JFC plans to use a Gauge Logbook that will indicate who has the gauge in use, which number they, date and time it was taken out of the lab to be used. I have attached a copy of the logbook that is to be used, and that is currently in use now.

Thanks,

Kyle Turpin





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

September 17, 2021

Mr. Kyle Turpin  
Radiation Safety Officer  
JFC Engineering and Surveyors  
1682 Sunset Drive  
Rock Springs, WY 82901

SUBJECT: NRC INSPECTION REPORT 030-36845/2021-001 AND NOTICE OF VIOLATION

Dear Mr. Turpin:

This letter refers to the inspection conducted onsite on July 21, 2021 at your storage facility located at 890 Powerhouse Drive in Rock Springs, Wyoming with continued in-office review through September 13, 2021. The inspection examined activities conducted under your license as they relate to safety and security, to compliance with the U.S. Nuclear Regulatory Commission's (NRC) rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. A preliminary exit was conducted with you on July 21, 2021 at the conclusion of the onsite inspection. A final exit was conducted with you telephonically on September 14, 2021.

Based on the results of this inspection, the NRC has determined that four Severity Level IV violations of NRC requirements occurred. These violations were evaluated in accordance with the NRC Enforcement Policy, which can be found at the NRC's Web site at: <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violations are cited in the enclosed Notice of Violation (Notice) because they were identified by the NRC during the inspection. These violations involved the failure to: (1) perform leak tests on the portable gauges at the frequency required by the NRC; (2) conduct semiannual inventories for your portable gauges; (3) periodically (at least annually) review the radiation protection program; and (4) maintain a log book for gauge accountability.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful. You can find the Information Notice on the NRC website at: <https://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1996/in96028.html>. The NRC will review your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.


In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, should you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

K. Turpin

2

Should you have any questions concerning this inspection, please contact Ms. Marti Poston-Brown at (817) 200-1181 or the undersigned at (817) 200-1455.

Sincerely,

 Signed by Roldán-Otero, Lizette  
on 09/17/21

Lizette Roldán-Otero, PhD, Chief  
Materials Inspection Branch  
Division of Nuclear Materials Safety

Docket No. 030-36845  
License No. 49-27798-01

Enclosure:  
Notice of Violation (Notice)

cc w/enclosure:  
David Adams, CHP  
Program Manager  
Wyoming Department of  
Environmental Quality  
Land Quality Division  
200 West 17<sup>th</sup> St., Suite 10  
Cheyenne, WY 82002

K. Turpin

3

SUBJECT: NRC INSPECTION REPORT 030-36845/2021-001 AND NOTICE OF VIOLATION  
DATED SEPTEMBER 17, 2021

**DISTRIBUTION:**

SMorris,ORA  
JMonninger, DRA  
MMuessle, D/DNMS  
LHowell, DD/DNMS  
R4DNMS\_MIB

ADAMS ACCESSION NUMBER: **ML21259A262**

xSUNSI Review: ADAMS:

By: MPB       Yes    No       Publicly Available and non-sensitive

OFFICE	NMSS/DUWP/URMDB	C:MIB				
NAME	MPoston-Brown	LRoldanOtero				
SIGNATURE	<b>MRP1</b>	<b>LRO</b>				
DATE	9/16/21	9/17/21				

OFFICAL RECORD COPY

## NOTICE OF VIOLATION

JFC Engineering and Surveyors  
Rock Springs, WY

Docket No. 030-36845  
License No. 49-27798-01

During an NRC inspection conducted on July 21, 2021, four violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. License Condition 13.A of radioactive material license 49-27798-01 Amendment 8, issued May 9, 2017 states in part that, sealed source shall be tested for leakage and contamination at intervals not to exceed the intervals specified in the certificate of registration issues by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State.

The registration certificate for the Troxler Portable Gauge Model #3400 NC-646-D-130-S issued April 4, 2007 by an North Carolina, an Agreement State specifies a leak test frequency of 12 months.

Contrary to the above, between February 24, 2016 and April 3, 2018, the licensee failed to conduct leak tests on all four gauges in their possession. At least two of these four gauges were used during this period. Specifically, leak tests were not conducted for Gauge #1 (serial number 34977) from August 4, 2015 to March 17, 2021; Gauge #2 (serial number 36973) from February 24, 2016 to April 30, 2018; Gauge 3 (serial number 37709) from February 27, 2015 to March 17, 2021, and Gauge 4 (serial number 36168) from February 24, 2016 to April 3, 2018. Based on use logs, which the licensee discontinued on September 23, 2017, Gauge 3 was used from June 28, 2016 to August 17, 2016 and from June 5, 2017 to August 23, 2017 and Gauge 4 was used from June 20, 2017 to September 23, 2017 without a current leak test.

This is a Severity Level IV violation (Section 6.3.d).

- B. License Condition 15 of radioactive material license 49-27798-01 Amendment 8, issued May 9, 2017 states that, the licensee shall conduct a physical inventory every 6 months or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sealed sources and/or device received, and possessed under the license. Records of inventories shall be maintained for 3 years from the date of each inventory.

Contrary to the above, from November 17, 2015 to July 21, 2021, the licensee failed to conduct a physical inventory every 6 months. Specifically, the licensee conducted inventory when the annual leak tests were not performed as follows: (1) No inventories were performed in calendar year 2017 for any of the four gauges; and (2) Two of the four gauges were not inventoried for calendar years 2016, 2018, 2019 and 2020.

This is a Severity Level IV violation (Section 6.3.d)

Enclosure

- C. 10 CFR 20.1101(c) states that, the licensee shall periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above from November 11, 2015 to July 21, 2021 the licensee failed to conducted periodic (at least annual) reviews of the radiation protection program content and implementation.

This is a Severity Level IV violation (Section 6.7.d)

- D. License Condition 19 of radioactive material license 49-27798-01 Amendment 8, issued May 9, 2017 states in part that, "unless specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations and procedures contained in the documents, including enclosures listed " The application for license renewal dated February 9, 2015 is listed as document "A" under License Condition 19.

In the license application dated February 9, 2015, the licensee used the suggested format for completion of items 5-11 of NRC Form 313, provided as Appendix B to NUREG-1556 Volume 1, Revision 1., "Program-Specific Guidance About Portable Gauge License," Section 10, "Radiation Safety Program – Operating and Emergency Procedures." The NUREG-1556 allows the licensee to commit to using the proposed procedures in Appendix H of the NUREG or submitting their own procedures. The licensee committed to using the Appendix H procedures.

The Appendix H Section titled "Operating Procedures," third bullet states "sign out the gauge in a logbook (that remains at the storage location) including the date(s) of use, name of the authorized users who will be responsible for the gauge and the temporary jobsite where the gauge will be used." The 16<sup>th</sup> bullet states "log the gauge into the daily use log when it is returned to storage."

Contrary to the above, after September 23, 2017, the licensee failed to sign out the gauge in a logbook (that remains at the storage location) including the date(s) of use, name of the authorized users who will be responsible for the gauge and the temporary jobsite where the gauge will be used, and failed to log the gauge into the daily use log when it was returned to storage. Specifically, after September 23, 2017, the licensee discontinued the use of log books to track use of the gauges.

This is a Severity Level IV violation (Section 6.3.d)

Pursuant to the provisions of 10 CFR 2.201, JFC Engineering and Surveyors, is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved.

Your response may reference or include previous docketed correspondence if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days of receipt.

Dated this 17th day of September 2021





## Portable Gauge Audit Checklist

**Note:** All areas indicated in audit notes may not be applicable to every license and may not need to be addressed during each audit. For example, licensees do not need to address areas that do not apply to their activities, and activities that have not occurred since the last audit need not be reviewed during the next audit.

Licensee's name JFC ENGINEERS & SURVEYORS License No. 49-27798-01  
Date of This Audit 8/19/2021 Date of Last Audit NONE PRIOR  
Audit Date Range 8/19/2021 - 8/19/2022

[Signature]  
Auditor Signature  
[Signature]  
Management Signature

Kyle TURNER  
Auditor Printed Name  
John B. Eddins  
Management Printed Name

8/19/2021  
Date  
8-19-21  
Date

### 1. AUDIT HISTORY

- Were previous audits conducted periodically (at least annually)? (10 CFR 20.1101)  
NONE PRIOR
- Were records of previous audits maintained? (10 CFR 20.2102)  
NONE PRIOR
- Were any deficiencies identified during the last two audits or 2 years, whichever is longer?  
NONE PRIOR
- Were corrective actions taken? (Look for repeated deficiencies)  
NONE PRIOR

### 2. ORGANIZATION AND SCOPE OF PROGRAM

- If the mailing address or places of use and/or storage changed, was the license amended? [License Condition (L/C)] N/A
- If ownership changed or bankruptcy was filed, did the licensee obtain prior U.S. Nuclear Regulatory Commission (NRC) consent or notify the NRC? [10 CFR 30.34(b)] N/A
- If the licensee changed the radiation safety officer (RSO), was the license amended? (L/C) N/A
- Sealed Sources and Devices
  - Does the license authorize all of the NRC-regulated radionuclides contained in the gauges possessed? (L/C) YES
  - Are the gauges as described in the Sealed Source and Device (SSD) registration certificate? (L/C) YES
  - Are copies of (or access to) SSD registration certificates available?  
YES

4. Are manufacturer's manuals for operation and maintenance available?  
(10 CFR 32.210) **YES**
5. Are the actual uses of gauges consistent with the authorized uses listed on the license? (L/C) **YES**
6. Are the locations of use of the gauges compatible with the "Conditions of Normal Use" and "Limitations and/or Other Considerations of Use" on the SSD registration certificates? (L/C) **YES**
- e. Is the current inventory of material below the possession limits listed on the license? (L/C) **YES**

### 3. TRAINING AND INSTRUCTIONS TO WORKERS

- a. Were all workers who are likely to exceed 1 mSv [100 mrem] in a year instructed per 10 CFR 19.12? Was refresher training provided, as needed? Were records maintained? **YES.**
- b. Is each gauge operator trained in accordance with license requirements? (L/C) **YES**
- c. Are training records maintained for each gauge operator? **YES**
- d. Did interviews with operators reveal that they know the operating, emergency and security procedures? **YES**
- e. Did this audit<sup>1</sup> include observation of operators using the gauge in a field situation? Operating the gauge? Performing routine cleaning and lubrication? Transporting the gauge? Storing the gauge? Was the use of the gauge in accordance with regulations? **YES**
- f. Did the operator demonstrate safe handling and security during transportation, use, and storage? **YES**
- g. Was U.S. Department of Transportation (DOT) hazardous material (HAZMAT) training (required at least once every 3 years) provided as required? (49 CFR 172.700, 49 CFR 172.701, 49 CFR 172.702, 49 CFR 172.704) **YES. BESIDES KYLE TURPIN WHO'S EXPIRED**

5/16/19.

### 4. RADIATION SURVEY INSTRUMENTS

WILL RENEW

- a. If the licensee possesses its own survey meter, does the survey meter meet NRC requirements? [10 CFR 20.1501(c)] **YES**
- b. Are calibration records maintained, if applicable? [10 CFR 20.2103(a)]  
**LAST CALIBRATION IS 2015. WILL GET CALIBRATED BY GAL-TEK**
- c. If the licensee does not possess a survey meter, are specific plans made to have one available in the event of an emergency? **N/A**

<sup>1</sup>The auditor should consider performing a performance-based review consisting of field observations and tours.

5. GAUGE INVENTORY

- a. Is a record kept showing the receipt of each gauge? [10 CFR 30.51(a)(1)]  
YES
- b. Are all gauges physically inventoried every 6 months or at other intervals approved by the NRC? (L/C) NOT DONE PREVIOUSLY BUT WILL MOVING FORWARD WITH OUTLOOK REMINDER
- c. Are records of inventory with appropriate information maintained? (L/C)  
N/A

6. PERSONNEL RADIATION PROTECTION

- a. Are considerations for keeping doses as low as is reasonably achievable (ALARA) incorporated into the radiation protection program? [10 CFR 20.1101(b)]  
YES
- b. Were prospective evaluations performed showing that unmonitored individuals receive less than the limits in 10 CFR 20.1502(a)? Did these evaluations consider doses to minors [10 CFR 20.1502(a)(2)] and declared pregnant women [10 CFR 20.1502(a)(3)]?  
NO
- c. Did unmonitored individuals' activities change during the year in a way that could put them over the limits in 10 CFR 20.1502(a)? If yes, was a new evaluation performed?  
NO
- d. If external dosimetry is required [i.e., when individuals are likely to receive greater than the limits in 10 CFR 20.1502(a)], is dosimetry provided to these individuals? If yes, address the following:  
NO
  - 1. Is the dosimetry supplier approved by the National Voluntary Laboratory Accreditation Program? [10 CFR 20.1501(c)]
  - 2. Are the dosimeters exchanged at the appropriate frequency?
  - 3. Are dosimetry reports reviewed and signed by the RSO when they are received?
  - 4. Are the records based on NRC forms or the equivalent? [10 CFR 20.2104(d), 10 CFR 20.2106(c)]
    - Is NRC Form 4, "Cumulative Occupational Exposure History," completed?
    - Is NRC Form 5, "Occupational Dose Record for a Monitoring Period," completed?
- e. Are there any declared pregnant workers?  
NO
  - 1. If a worker declared her pregnancy, did the licensee comply with 10 CFR 20.1208, "Dose equivalent to an embryo/fetus"?  
—
  - 2. Were records kept of embryo/fetus dose per 10 CFR 20.2106(e)?  
—
- f. Are records of exposures, surveys, monitoring, and evaluations maintained? (10 CFR 20.2102, 10 CFR 20.2103, 10 CFR 20.2106)  
NO

## 7. PUBLIC DOSE

- a. Are gauges stored in a manner to keep doses to members of the public below 1 millisievert (mSv) (100 mrem) in a year? [10 CFR 20.1301(a)(1)]  
YES
- b. Has a survey or evaluation been performed per 10 CFR 20.1501(a)? Have there been any additions or changes to the storage, security, or use of the surrounding areas that would necessitate a new survey or evaluation? NO
- c. Do unrestricted area radiation levels exceed 0.02 mSv (2 mrem) in any one hour? [10 CFR 20.1301(a)(2)]  
NO
- d. Are gauges being stored in a manner that would prevent unauthorized use or removal? (10 CFR 20.1801)  
YES
- e. Are records of surveys maintained? (10 CFR 20.2103, 10 CFR 20.2107)  
NO

## 8. OPERATING, EMERGENCY, AND SECURITY PROCEDURES

**Note:** An ideal way to assess the adequacy and adherence to operating procedures is by observing work in progress.

- a. Have operating, emergency, and security procedures been developed and updated to incorporate any new elements, practices, or requirements? YES
- b. Does each operator have current copies of the operating, emergency, and security procedures, including current emergency telephone numbers? YES
- c. Did any emergencies occur?  
NO
1. If so, were they handled properly?
2. Were appropriate corrective actions taken?
- d. Were gauges properly controlled or secured during use or storage? (10 CFR 20.1801, 10 CFR 20.1802) Are the gauges in storage being secured with two independent physical controls? [10 CFR 30.34(i)]

## 9. LEAK TESTS

- a. Were sealed source leak tests performed every 6 months or at other authorized intervals? (L/C) YES - 2021
- b. Were leak tests performed in accordance with license requirements? (L/C)  
YES - 2021
- c. Are records of leak test results retained with all of the required information included? (L/C)  
YES - 2021
- d. Were any sources found to be leaking, and if yes, was the NRC notified? (L/C)  
NO

## 10. MAINTENANCE OF GAUGES

- a. Are manufacturer's procedures followed for routine cleaning and lubrication of the gauge? **YES**
- b. Does the source rod remain attached to the gauge during cleaning? (L/C) **YES**
- c. Is nonroutine maintenance performed where the source or source rod is detached from the gauge? If yes, was it performed according to license requirements (e.g., extent of work, individuals performing the work, procedures, dosimetry, survey instrument, compliance with limits under 10 CFR 20.1301, "Dose limits for individual members of the public")? **NO**
- d. Are labels, signs, and postings identifying gauges containing radioactive material, radiation areas and warnings clean and legible? **9 NEW STICKERS ON OUTSIDE OF CASE IF NEEDED**

## 11. TRANSPORTATION

- a. Were U.S. Department of Transportation (DOT)-7A or other authorized packages used? [49 CFR 173.415, 49 CFR 173.416(b)] **NO**
- b. Are Type A package, engineering drawings, and performance test records on file? [49 CFR 171.2 (a, b, e), 49 CFR 173.415(a)] **NO**
- c. For any special form source, is the International Atomic Energy Agency Certificate of Competent Authority or other safety analysis documentation maintained on file? [49 CFR 173.476(a)] **NO**
- d. Were packages properly labeled? (49 CFR 172.400, 49 CFR 172.403, 49 CFR 172.406, 49 CFR 172.407) **YES**
- e. Were packages properly marked? (49 CFR 172.301, 49 CFR 172.304, 49 CFR 172.310, 49 CFR 172.324) **YES**
- f. Were packages closed and sealed (e.g., locked) during transport? [49 CFR 173.475(f)] **YES**
- g. Were shipping papers prepared and used? [49 CFR 172.200(a)] **YES**
- h. Did the shipping papers contain proper entries {e.g., proper shipping name, hazard class, identification number [United Nations (UN)] number, total quantity, package type, nuclide, reportable quantity (RQ)(if applicable), physical and chemical form, activity (International System of Units required), category of label, Transportation Index (TI), shipper's name, certification and signature, emergency response phone number, and cargo aircraft only (if applicable)}? (49 CFR 172.200, 49 CFR 172.201, 49 CFR 172.202, 49 CFR 172.203, 49 CFR 172.204, 49 CFR 172.604) **N/A**
- i. Were the shipping papers within the driver's reach and readily accessible during transport? [49 CFR 177. 817(e)] **YES**
- j. Were packages secured against movement? (49 CFR 177.834) **YES**

- k. Were placards on the vehicle, if needed? (49 CFR 172.504)
- l. Were overpacks, if needed, used properly? (49 CFR 173.25) <sup>N/A</sup>
- m. Were any incidents reported to the DOT? (49 CFR 171.15, 49 CFR 171.16) <sup>N/A</sup>

**12. AUDITOR'S INDEPENDENT SURVEY MEASUREMENTS (IF MADE)**

Describe the type, location, and results of the measurements. Does any radiation level exceed regulatory limits? [10 CFR 20.1501(a), 10 CFR 20.1502(a)] <sup>NO</sup>

**13. NOTIFICATION AND REPORTS**

- a. Did any reportable incidents occur? Were the appropriate notifications made to the NRC Emergency Operations Center (301-816-5100)? Examples of incidents with notification requirements are as follows: <sup>NO</sup>
  - 1. Lost or stolen radioactive material (10 CFR 20.2201)
  - 2. Overexposures or high radiation levels (10 CFR 20.2202) <sup>NO</sup>
  - 3. Gauge is disabled or fails to function as designed [10 CFR 30.50(b)(2)] <sup>NO</sup>
  - 4. Generic equipment issues identified by the licensee (10 CFR 21.21) <sup>NO</sup>
- b. Were the required written reports made as followups to the events? <sup>NO</sup>  
<sub>N/A</sub>

**14. POSTING AND LABELING**

- a. Is NRC Form 3, "Notice to Employees," posted? (10 CFR 19.11) <sup>YES</sup>
- b. Are NRC regulations and license documents posted, or is a notice posted stating where these documents are located? (10 CFR 19.11, 10 CFR 21.6) <sup>YES</sup>
- c. Are any other posting and labeling requirements met? (10 CFR 20.1902, 10 CFR 20.1904) <sup>YES</sup>

**15. DECOMMISSIONING**

- a. Were any locations of use or separate buildings decommissioned since the last audit? Were appropriate notifications made or license amendments requested? (10 CFR 30.36) <sup>NO</sup>
- b. Are records kept of information important to decommissioning? [10 CFR 30.35(g)] <sup>N/A</sup>
- c. Do records include all information outlined in 10 CFR 30.35(g)? <sup>YES</sup>

**16. GENERIC COMMUNICATIONS AND NEWSLETTER**

- a. Are NRC Regulatory Issue Summaries, NRC Information Notices, and Office of Nuclear Material Safety and Safeguards quarterly newsletters received? *No*
- b. Is appropriate training and action taken in response to these? *N/A*

**17. SPECIAL LICENSE CONDITIONS OR ISSUES**

Did the auditor review special license conditions or other issues (e.g., nonroutine maintenance)? (L/C) *YES*

**18. EVALUATION OF OTHER FACTORS**

- a. Is senior licensee management appropriately involved with the radiation protection program and/or RSO oversight? *No*
- b. Does the RSO have sufficient time to perform his or her radiation safety duties? *YES*
- c. Does the licensee have sufficient staff to support the radiation protection program? *YES*

**19. DEFICIENCIES IDENTIFIED IN AUDIT AND CORRECTIVE ACTIONS**

- a. Summarize problems and/or deficiencies identified during the audit. *NONE COMPLETED PRIOR. WILL COMPLETE YEARLY*
- b. If problems and/or deficiencies were identified in this audit, describe the corrective actions planned or taken. Are corrective actions planned or taken at *all* licensed locations (not just the location audited)? Include date(s) when corrective actions are implemented. *-*
- c. Provide any other recommendations for improvement. *-*
- d. Describe communication with management about deficiencies. *-*