



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

January 5, 2022

Mr. Jim Wright, Director of Safety and Health  
Terracon Consultants, Inc.  
10841 South Ridgeview Road,  
Olathe, Kansas 66061

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-32176/2019-005, NOTICE OF VIOLATION, AND REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Wright:

On September 30, 2021, the U.S. Nuclear Regulatory Commission (NRC) cited Terracon Consultants, Inc., for five violations that involved the failures to: (1) control and maintain constant surveillance of licensed material in an unrestricted area that was not secured with two independent physical controls; (2) block and brace licensed material from movement incident to normal transportation; (3) follow your established operating and emergency procedures that require the gauge be placed in a U.S. Department of Transportation Type A container when being transported on public highways; (4) lock the gauge's handle of the source rod or place the gauge inside of a locked container to prevent unauthorized or accidental removal of the source rod from its shielded position; and (5) provide a notification to the NRC immediately after the discovery of any lost or missing licensed material in an aggregate quantity equal to or greater than 1,000 times the quantity specified in Appendix C of Title 10 of the Code of Federal Regulations (10 CFR) Part 20.

The NRC Inspection Report 030-32176/2019-005 with enclosed Notice of Violation required you to respond in writing in 30 days (NRC Agencywide Documents Access and Management System (ADAMS) Accession [ML21273A376](#)). In addition, in a letter dated November 29, 2021 (ADAMS Accession [ML21333A156](#)), the NRC required additional information concerning your corrective actions for the violation of 10 CFR 20.2201. You responded in a letter dated December 21, 2021 (ADAMS Accession [ML21356A573](#)).

After reviewing the information provided in your response, we have concluded that your proposed actions appear to adequately address the regulatory noncompliances described in the Notice for Violations E (regarding the violation of 10 CFR 20.2201). We will review your implementation of these corrective actions during a future inspection to determine whether full compliance has been restored and whether compliance will be maintained.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedures," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,



Signed by Roldan-Otero, Lizette  
on 01/05/22

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

Docket No. 030-32176  
License No. 15-27070-01

cc:

Kimberly S. Steves, Director  
KS Department of Health & Environment  
1000 SW Jackson, Suite 330  
Topeka, KS 66612-1365

Jeffery D. Semancik, Director  
Radiation Division  
Connecticut Dept. of Energy and  
Environmental Protection  
79 Elm Street  
Hartford, CT 06106

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-32176/2019-005, NOTICE OF VIOLATION - DATED JANUARY 5, 2022

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ADAMS ACCESSION NUMBER: **ML22004A309**

SUNSI Review:                      ADAMS:                       Non-Publicly Available                       Non-Sensitive                      Keyword:  
 By: JEV                       Yes    No                       Publicly Available                       Sensitive                      NRC-002

OFFICE	RI/DRSS/CIRDA	C:MIB				
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