



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

January 7, 2022

EA-21-145

Mr. Tony Martin
President/Radiation Safety Officer
Northwest Inspection, Inc.
615 North Kellogg Street
Kennewick, WA 99336

SUBJECT: NRC INSPECTION REPORT 150-00046/2021-001

Dear Mr. Martin:

This letter refers to the unannounced reciprocity inspection conducted on July 15, 2021, at a temporary jobsite location in Athol, Idaho, with continued in-office review through December 6, 2021. This inspection examined activities conducted under a general license pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 150.20 for your activities performed in area of exclusive Federal jurisdiction, as they relate to public health and safety and to confirm compliance with the U.S. Nuclear Regulatory Commission (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. The inspector discussed the preliminary inspection findings with Mr. Joshua Remme of your staff at the conclusion of the on-site portion of the inspection. A final exit briefing was conducted telephonically with you on December 6, 2021. The enclosed report presents the results of the inspection.

Based on the results of this inspection, one apparent violation was identified and is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The apparent violation involved the failure of the licensee's radiographer assistant to wear all required personnel monitoring devices in accordance with 10 CFR Section 34.47, "Personnel monitoring." Specifically, a radiographer's assistant failed to wear a personnel dosimeter on the trunk of their body during radiographic operations. The circumstances surrounding this apparent violation, the significance of the issue, and the need for lasting and effective corrective action were discussed with you during the telephonic exit meeting on December 6, 2021.

In addition, since your facility has not been the subject of an escalated enforcement action within the last two inspections and based on our understanding of your corrective actions, a civil penalty may not be warranted in accordance with Section 2.3.4 of the Enforcement Policy. The final decision will be based on you confirming on the license docket that the corrective actions previously described to the NRC staff have been or are being taken.

Before the NRC makes its enforcement decision, we are providing you an opportunity to: (1) respond to the apparent violation addressed in this inspection report within 30 days of the date of this letter, or (2) request a predecisional enforcement conference (PEC). If a PEC is held, it will be open for public observation and the NRC may issue a press release to announce the time and date of the conference. If you decide to participate in a PEC, please contact Ms. Lizette Roldán-Otero, PhD, at (817) 200-1455 or lizette.roldan-otero@nrc.gov within 10 days of the date of this letter. A PEC should be held within 30 days of the date of this letter.

If you choose to provide a written response, it should be clearly marked as a "Response to An Apparent Violation in NRC Inspection Report 150-00046/2021-001; EA-21-145" and should include for the apparent violation: (1) the reason for the apparent violation or, if contested, the basis for disputing the apparent violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response.

Additionally, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy mailed to Ms. Mary C. Muessle, Director, Division of Nuclear Materials Safety, Region IV, 1600 East Lamar Boulevard, Arlington, Texas, 76011, and emailed to R4Enforcement@nrc.gov within 30 days of the date of this letter. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a PEC.

If you choose to request a PEC, the conference will afford you the opportunity to provide your perspective on these matters and any other information that you believe the NRC should take into consideration before making an enforcement decision. The decision to hold a PEC does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference would be conducted to obtain information to assist the NRC in making an enforcement decision. The topics discussed during the conference may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned.

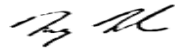
In presenting your corrective action, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violations. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful in preparing your response. You can find the Information Notice on the NRC website at: <https://www.nrc.gov/docs/ML0612/ML061240509.pdf>.

Please be advised that the characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

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, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

If you have any questions concerning this matter, please contact Dr. Lizette Roldán-Otero, of my staff at (817) 200-1455.

Sincerely,



Signed by Muessle, Mary
on 01/07/22

Mary C. Muessle, Director
Division of Nuclear Materials Safety

Docket No. 150-00046
License No. General License pursuant to 10 CFR 150.20

Enclosure:
NRC Inspection Report 150-00046/2021-001

cc w/Enclosure:

Mark Dietrich, PE, State Liaison Officer
Idaho Department of Environmental Quality
1410 N. Hilton St.
Boise, ID 83706

Jill Dinehart Wood, Director
Office of Radiation Protection
Washington Department of Health
P.O. Box 47827
Olympia, WA 98504-7827

SUBJECT: NRC INSPECTION REPORT 150-00046/2021-001 - DATED JANUARY 7, 2022

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ADAMS ACCESSION NUMBER: **ML22006A254**

SUNSI Review: ADAMS: Non-Publicly Available Non-Sensitive Keyword:
 By: ACR Yes No Publicly Available Sensitive EA-21-145

OFFICE	MIB	C:MIB	TL:ACES	RC	D:DNMS
NAME	LWardrobe	LRoldanOtero	JGroom	DCylkowski	MMuessle
SIGNATURE	/RA/ E	/RA/ E	/RA/ E	/RA/ E	MCM
DATE	12/06/21	12/16/21	01/03/22	01/04/22	01/07/2022

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket No.: 150-00046

License No.: General License pursuant to 10 CFR 150.20 (WN-IR065-1)

Inspection Report No.: 150-00046/2021-001

EA No: EA-21-145

Licensee: Northwest Inspection, Inc.

Location Inspected: 2244 E. Seasons Road
Athol, Idaho 83801

Inspection Dates: July 15, 2021, through December 6, 2021

Exit Meeting Date: December 6, 2021

Inspector: Leonardo Wardrobe, Health Physicist
Materials Inspection Branch
Division of Nuclear Materials Safety, Region IV

Approved By: Lizette Roldán-Otero, PhD, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety, Region IV

Attachment: Supplemental Inspection Information

Enclosure

EXECUTIVE SUMMARY

Northwest Inspection, Inc. NRC Inspection Report 150-00046/2021-001

On July 15, 2021, the U.S. Nuclear Regulatory Commission (NRC) performed an unannounced inspection of Northwest Inspections, Inc. (Northwest), a State of Washington licensee, at a temporary jobsite in Athol, Idaho, with in-office reviews through December 6, 2021. The inspection included reviews of Northwest activities in exclusive Federal jurisdiction in Idaho under reciprocity as they relate to the public health and safety and to confirm compliance with the NRC's rules and regulations.

Program Overview

Northwest is authorized under the State of Washington license no. WN-IR065-01 to possess and use byproduct material, including iridium-192 and selenium-75, in industrial radiographic exposure devices. The licensee was working under a reciprocal agreement authorized by a general license pursuant to 10 CFR 150.20 to perform these licensed activities at temporary jobsites in areas of exclusive Federal jurisdiction. At the time of inspection, Northwest was performing licensed activities in Athol, Idaho. (Section 1)

Inspection Findings

As a result of this inspection, one apparent violation was identified concerning the failure of a radiographer's assistant to wear, on the trunk of the body, a direct reading dosimeter, an operating alarm ratemeter, and a personnel dosimeter at all times during radiographic operations in accordance with 10 CFR 34.47(a). (Section 3)

Corrective Actions

The licensee immediately ceased radiographic operations on the day of the inspection and provided additional radiation safety training to all employees. In addition, the licensee incorporated into its procedures the requirement for radiographers to ensure their assistants have all the required dosimetry.

REPORT DETAILS

1 Program Overview (Inspection Procedure (IP) 87121)

1.1 Program Scope

Northwest Inspections, Inc. (Northwest) is authorized under the State of Washington WN-IR065-01 to possess and use byproduct material, including iridium-192 and selenium-75, for use in industrial radiographic exposure devices. This licensee was working under a reciprocal agreement authorized by a general license pursuant to 10 CFR 150.20 to perform these licensed activities at temporary jobsites in areas of exclusive Federal jurisdiction. At the time of inspection, Northwest was performing licensed activities in Athol, ID under reciprocity, and also during calendar year 2021.

1.2 Inspection Scope

The temporary jobsite inspection was performed on July 15, 2021 in Athol, Idaho. The inspection continued with in-office review through December 6, 2021. The inspection included reviews of activities, interviews with personnel and selected records review with respect to Northwest's work in exclusive Federal jurisdiction as they relate to public health and safety, and to confirm compliance with the NRC's rules and regulations.

2 Background (IP 87121)

Northwest performs various types of nondestructive testing including radiographic analysis on piping and pressure vessel welds. The inspector reviewed the licensee's Agreement State license and NRC Form 241 and confirmed that the licensee was authorized to perform radiographic operations at a temporary jobsite in NRC jurisdiction using iridium-192 and selenium-75 on July 15, 2021.

The inspector observed/reviewed radiographic operations at a temporary jobsite location in NRC jurisdiction (Athol, Idaho).

3 Observations and Findings (IP 87121)

During an onsite inspection conducted on July 15, 2021, which continued remotely until the date of the exit meeting on December 6, 2021, the inspector reviewed licensed activities pertinent to industrial radiographic operations in Athol, Idaho. During this review, one apparent violation of NRC requirements was identified.

3.1 Apparent Violation of 10 CFR 34.47(a)

Title 10 CFR 34.47(a), requires, in part, that the licensee may not permit any individual to act as a radiographer or radiographer's assistant unless, at all times during radiographic operations, each individual wears, on the trunk of the body, a direct reading dosimeter, an alarming ratemeter, and a personnel dosimeter.

Contrary to the above, on July 15, 2021, a radiographer's assistant performed radiographic operations and failed to wear, on the trunk of the body, a direct reading dosimeter, an alarming ratemeter, and a personnel dosimeter. Specifically, a

radiographer's assistant was performing radiographic operations in NRC jurisdiction and failed to wear a personnel dosimeter.

The failure to wear a personnel dosimeter while performing radiographic operations in NRC jurisdiction was identified as an apparent violation of 10 CFR 34.47(a). (150-00046/2021-001-01)

4 Corrective Actions

The licensee immediately ceased radiographic operations, and on July 16, 2021, the radiography assistant completed additional radiation safety training. On July 19, 2021, the licensee had completed additional training with licensee personnel on "The Importance of Wearing Radiation Safety Equipment" and issued an all-employees memo on the above topic. The memo included that radiographers should ensure that their radiographer's assistant/trainee should be wearing all required personnel dosimetry. In addition, Northwest updated its procedures to include a check box for a personal dosimetry in the daily "Radiation Safety Report", included a section in the annual radiation training about the proper use of personal dosimetry, and will ensure use of personnel dosimetry during the semi-annual field audits.

5 Exit Meeting Summary

On December 6, 2021, an exit meeting was held by telephone with Mr. Tony Martin, Radiation Safety Officer. The inspector summarized the inspection findings and observations, indicating that one apparent violation was identified and that a choice letter will be transmitted.

Supplemental Inspection Information

PARTIAL LIST OF PERSONS CONTACTED

Joshua Remme, Radiographer
Wilbert Pedraza, Radiographer's Assistant
*Tony Martin, Radiation Safety Officer

* Individuals present at exit meeting conducted by telephone on December 6, 2021

INSPECTION PROCEDURE USED

IP 87121 – Inspection of Industrial Radiography Programs

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

150-00046/2021-001-01	AV	Failure to wear a personnel dosimeter (10 CFR 34.47(a))
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Closed

None.

Discussed

None.

LIST OF ACRONYMS USED

10 CFR	Title 10 of the <i>Code of Federal Regulations</i>
ADAMS	Agencywide Documents Access and Management System
AV	Apparent Violation
IP	Inspection Procedure
NRC	U.S. Nuclear Regulatory Commission
PEC	Predecisional Enforcement Conference
RSO	Radiation Safety Officer