

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED

TERRADON Corporation
409 Jacobson Drive, Poca, WV
Remote Review of 790 Court St. South, Lewisburg, WV

2. NRC/REGIONAL OFFICE

Region 1
2100 Renaissance Blvd
Suite 100
King of Prussia, PA 19406-2713

REPORT NUMBER(S) 2022001

3. DOCKET NUMBER(S)

030-35483

4. LICENSE NUMBER(S)

47-25539-01

5. DATE(S) OF INSPECTION

01/13/2022 - 03/15/2022

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- 1. Based on the inspection findings, no violations were identified.
- 2. Previous violation(s) closed.
- 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

1 Non-cited violation(s) were discussed involving the following requirement(s):

10 CFR 19.13(b) requires, in part, that each licensee shall make dose information available to workers as shown in records maintained by the licensee under the provisions of 10 CFR 20.2106. The licensee shall provide an annual report to each individual monitored under 10 CFR 20.1502 of the dose received in that monitoring year if the individual's occupational dose exceeds 100 mrem TEDE or if the individual requests their annual dose report.

The licensee self-identified and corrected this issue without intervention by the NRC. The issue would have been characterized as a non-willful, and non-repetitive SLIV violation (NRC Enforcement Policy Section 6.3.d). As a result, this issue has been determined to be a non-cited violation.

- 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

10 CFR 20.1502 requires, in part, that each licensee shall monitor exposures to radiation and radioactive material at levels sufficient to demonstrate compliance with the occupational dose limits in 10 CFR Part 20.

License condition 18.A of NRC License No. 47-25539-01, Amendment No. 11, dated April 15, 2021, requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any inclusions, from the application dated September 21, 2020.

The application dated September 21, 2020, requires, in part, that the licensee provide and require the use of individual monitoring devices.

Contrary to the above, from January 1, 2019 through June 30, 2021, the licensee failed to monitor exposures to radiation and radioactive material at levels sufficient to demonstrate compliance with the occupational dose limits in 10 CFR Part 20. Specifically, between 2019 and June 2021, licensee personnel used gauges and: (1) used and stored dosimeters in such a way that the resultant recorded exposures were not representative of the individuals' occupational exposure; and (2) in a single instance between January and June 2021, lost a personnel dosimeter. In both of the above cases, the licensee identified the issue and provided additional training, but failed to calculate, estimate, or otherwise assess the likely occupational exposure received by the applicable individuals and adjust the associated occupational exposure record.

This was determined to be a SLIV violation (NRC Enforcement Policy Section 6.7.d). The licensee corrected the above issues by estimating the occupational exposures for the individuals for the periods in question and submitting these to the dosimetry vendor for incorporation into the individuals' occupational exposure record.

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Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE'S REPRESENTATIVE	Jason Asbury, VP of GeoTechnical Serv.		3/22/22
NRC INSPECTOR	Jason vonEhr		
BRANCH CHIEF	Christopher Cahill		