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March 8, 2022

Response to Apparent Violations

NRC Inspection Report 150-00035/2020-002; EA-21-129

To whom it may concern:

I will do my best to address the items of apparent violations. I hope I can address it in a manor that is acceptable. This is not something I am accustomed to having to do, so if it is not written as well as it should be, please know I am trying to do my best and to cooperate fully.

Item number 1.

- A. 10 CFR 150.20(a)(1) states, in part, that any person who holds a specific license from an Agreement State is granted a general license to conduct the same activity in Non-Agreement States subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in a Non-Agreement State shall, at least 3 days before engaging in each activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, between April 1 and October 12, 2020, Advanced Inspection Technologies, Inc., a licensee of the state of Oklahoma, engaged in licensed activities in a Non-Agreement State without filing a submittal containing an NRC Form 241, a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office at least 3 days before engaging in each activity. Specifically, Advanced Inspection Technologies Inc., performed radiography for 20 days (April 1, June 4, July 12, 14, 17, 23, 29, August 5, 12, 16, 20, 27, September 2, 9, 14, 16, 23, and October 1, 10, 12, 2020) in Joplin, Missouri, but did not request reciprocity until October 14, 2020. Since the work was performed in a Non-Agreement State beginning on April 1, 2020, Advanced Inspection Technologies, Inc., was required to provide this information to the NRC by March 29, 2020.
(150-00035/2020-002-01)

Response to A:

As I said in my interviews, I take full responsibility. I was aware of the rules, but due to the situation with work in our industry, I was desperate for any work that I could get. I was barely covering payroll and I did not have the money for the reciprocity fee. When I did submit it, I had to borrow the money to send it in. I realize that that is not an excuse, but it is the truth. I have written this letter and re-written this letter several times, I can not find the words to express how sorry I am for all of this. I can not find a way to express my reasoning in this except just the plain simple truth; I was desperate. I was trying to keep my company going until hopefully things got better. I am not sure that time is going to come, at least not soon enough for us to survive.

Item number 2.

- B. 10 CFR 30.9(a) requires, in part, that information provided to the Commission by a licensee shall be complete and accurate in all material respects.**

Contrary to the above, on October 14, 2020, Advanced Inspection Technologies, Inc., a licensee of the state of Oklahoma, provided information to the Commission that was not complete and accurate in all material respects. Specifically, Advanced Inspection Technologies, Inc. submitted an NRC Form 241 that failed to include 14 dates (April 1, June 4, July 12, 14, 17, 23, 29, August 5, 12, 16, 20, 27, and September 2, 9, 2020) on which the company had already performed radiography in Joplin, Missouri. This information is material to the NRC because it is used to determine inspections of the licensee's radiography performed in a Non-Agreement State. (150-00035/2020-002-02)

Response to B:

As far as the dates, that is the dates I was given at first, but did not go back far enough. I was scared, I was panicking, anything to do with the NRC or DEQ is terrifying because, frankly, you hold our livelihood in your hands. I know I am at fault. I know I was wrong. It is embarrassing for me and has been very stressful. I can not afford lawyers to defend me or do the hearings. I do not know if I can even stay in business much longer. I do regret that I did this, but as I have stated when you are fighting to survive it can cause you to make bad decisions.

As far as corrective measures, I made the decision not to do any work out of state at all, no matter how much we could use the work. We have not gone out of Oklahoma, nor will I do jobs outside of Oklahoma again. I know you have no reason to believe me under these conditions: but I have always been a person that tried to do the best job I could and to follow the rules. I can assure you that I will not break this rule again. I will not go out of state for work under any conditions. There is no way I can completely express how sorry I am that I was a part of this, and for the trouble I have caused you and my company. This has caused me more stress, anxiety and depression than you can possibly imagine. This is not the person I am, and this is not how I have conducted business in the past.

I have tried to address the violations in the only way I know how, honestly and sincerely.

I regret this incident. I wish I had just suffered thru the lack of work and dealt with those consequences. Instead of making the bad decision that I made. I do sincerely apologize.

I know this is not a well written response, but it is a sincere response. I hope I addressed the areas that I needed to address. If there is anything else, please let me know.

Respectfully,

A handwritten signature in cursive script that reads "Sharon Busby". The signature is written in black ink and is positioned below the "Respectfully," text.

Sharon Busby

Owner/President

Advanced Inspection Technologies, Inc.



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March 8, 2022

Response to an Apparent Violation

NRC Investigation Report 4-2021-005; IA-21-069

To whom it may concern:

I will try my best to address this matter the best way I know how. I have struggled with how to answer the apparent violations. In the end, I decided to just do it as simply as I can under the conditions. I will try to explain myself and the decisions that I made the best that I can:

APPARENT VIOLATION

Based on the results of an NRC investigation completed on August 30, 2021, an apparent violation of NRC requirements was identified. The apparent violation is listed below:

10 CFR 30.10(a)(1) requires, in part, that an employee of a licensee may not engage in deliberate misconduct that causes a licensee to be in violation of any regulation.

10 CFR 150.20(a)(1) states, in part, that any person who holds a specific license from an Agreement State is granted a general license to conduct the same activity in Non-Agreement States subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in a Non-Agreement State shall, at least 3 days before engaging in each activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, between April 1 and October 12, 2020, you, the President of Advanced Inspection Technologies, Inc., engaged in deliberate misconduct that caused the licensee to be in violation of a regulation. Specifically, you caused Advanced Inspection Technologies, Inc., a licensee of the state of Oklahoma, to be in violation of a regulation when it engaged in licensed activities in a Non-Agreement State without filing a submittal containing an NRC Form 241, a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of NRC Region IV at least 3 days before engaging in each activity.

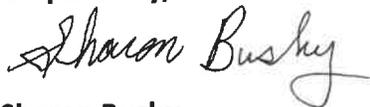
Response to Apparent Violations:

I have admitted to all the statements listed on the previous page. I regret that I did this, but I did. It was my decision to do it. I was aware of the rules pertaining to reciprocity. I did not do this because I thought I was above the rules; I have never felt that way no matter what I was doing. I was under a tremendous amount of pressure because of lack of work in our industry. I was panicking and stressed to the max trying to keep this company going. I was worried about my employees and their livelihood. I was trying to hold things together until possibly things got better. I am not a person that does not follow the rules. I have been in this industry since 1976 and have always had a good reputation and was known to be trusted. I have spent the last, almost, two years under more pressure than a person should have to deal with. This is not an excuse. I am just trying to explain why I made the decision I did. My employees are good people. They do a good job at work. I am proud of them. I feel responsible for them. I felt like I had to take whatever work I could get, in order to keep them working. They have always followed the rules and have always been very safe workers. This was my decision, even if it was a bad one, not my employees. They have been trained well. I trust them to do a good and safe job. They have never let me down. I did not want to let them down.

I can not change what I did. I can tell you that it will never happen again. I have not gone out of state, nor will I go out of state again. I realize that this response is not a vey good one. It is not well written. I realize you hold my future in your hands. I could not afford legal help, but I would not have gone that direction anyway. I am guilty of making a bad decision and of breaking the regulations. I was scared. I was under pressure. I was desperate to keep this business going.

I do not know what your decision will be. I do not know if I can stay in business until things get better. But I do wish that you could know how truly sorry that this happened. I wish that you could know just how much I have regretted it. I have always valued honesty. I have expected it of my employees and myself. The loss of trust has been very hard on me. I do not know what else I can say in my defense except this incident is not reflective of how I have run my company in the past, nor how I will run it as long I I can keep going. It was simply my reaction to fear and disparate times. I have spent the last two years dealing with constant pressure and an uncertain future. I am sincerely sorry, and I do not know what else I can say in my defense. Please know that I will not be part of anything like this again.

Respectfully,



Sharon Busby

Owner/ President

Advanced Inspection Technologies, Inc.