

### SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

**1. LICENSEE/LOCATION INSPECTED**

Concrete Imaging, Inc.  
240 John Rissler Road  
Charles Town, WV  
and a TJS at 1101 New York Ave NW, Washington, D.C.

**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)**

030-37778

**4. LICENSE NUMBER(S)**

47-31316-01

**5. DATE(S) OF INSPECTION**

05/16/2022 - 06/02/2022

**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.

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

- 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 30.9(a) requires, in part, that information required by the license conditions be maintained by the licensee shall be complete and accurate in all material respects.

License Condition 15 of NRC license 47-31316-01, Amendment No. 6, dated May 20, 2022, requires, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, from the application dated April 1, 2017.

The application dated April 1, 2017, Section 6 of the licensee's Operating and Emergency Procedures, Subsection 3.3.2, requires, in part, that prior to storing the exposure device in the permanent storage vault, the radiographer shall survey the device to assure the source is in the shielded position.

10 CFR 20.2103 requires, in part, that each licensee shall maintain records showing the results of surveys required by 10 CFR 20.1501.

Contrary to all the above, on May 26, 2022, the licensee failed to maintain records that were complete and accurate in all material respects. Specifically, at the start of a temporary job site in the District of Columbia, the licensee radiographer pre-filled out the licensee's Temporary Jobsite Survey Worksheet "FSAP-002," including the above-quoted return-to-vault on-contact reference survey of the radiographic exposure device. In pre-filling this form, the radiographer represented that this survey had been completed when it had not in fact been performed at this stage of the temporary job site, and thus creating and maintaining inaccurate information required by regulation and license condition on a record important to the NRC's safety and security oversight mission.

This was determined to be a SLIV violation (NRC Enforcement Policy Section 6.9.d). To correct the violation, the licensee RSO provided prompt retraining to all radiographic personnel on the importance of complete and accurate record creation.

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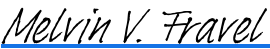
47-31316-01

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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	Mel Fravel, RSO, Dir. of Ops	 <small>Melvin V. Fravel (Jun 3, 2022 11:45 EDT)</small>	
NRC INSPECTOR	Jason vonEhr	<b>Jason E. VonEhr</b>	Digitally signed by Jason E. VonEhr Date: 2022.06.03 10:37:13 -04'00'
BRANCH CHIEF	Christopher Cahill		