

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED:  ISC - Inspection Services Company, Inc. 13101 Eckles Road Plymouth, MI 48170  REPORT NUMBER(S) 2022-001	2. NRC/REGIONAL OFFICE  Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. DOCKET NUMBER(S)  030-34203	4. LICENSE NUMBER(S)  21-26744-01	5. DATE(S) OF INSPECTION  04/29/22; in-office review through 07/20/22

**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 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)

Contrary to 10 CFR 71.5(a), as of April 29, 2022, ISC - Inspection Services Company, Inc. failed to comply with 49 CFR 172.704(c)(2) which requires that hazmat employees receive hazmat training once every three years. As corrective action for this Severity Level IV violation, on May 6, 2022, the licensee's sole active hazmat employee completed hazmat training. In addition, the licensee committed to provide hazmat training to the inactive employee if and when he returned to work, and set additional reminders for each employee to complete it again every three years.

**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	Mitchell C. Krugel	<i>Mitchell C. Krugel</i>	7/20/22
NRC INSPECTOR	Ryan Craffey	<i>Raf Craffey</i> Digitally signed by Ryan J. Craffey Date: 2022.07.20 13:54:10 -04'00'	
BRANCH CHIEF	Michael Kunowski	Michael A. Kunowski Digitally signed by Michael A. Kunowski Date: 2022.07.20 14:32:12 -05'00'	



### Materials Inspection Record

1. Licensee Name: ISC - Inspection Services Company, Inc.		2. Docket Number(s): 030-34203		3. License Number(s) 21-26744-01	
4. Report Number(s): 2022-001			5. Date(s) of Inspection: April 29, 2022; in-office review through July 20, 2022		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03121	8. Priority: 5	9. Inspection Guidance Used: IP 87124	
10. Licensee Contact Name(s): Mitchell Kruzell - RSO		11. Licensee E-mail Address: mitch.kruzell@isc-inspectionsservices.com		12. Licensee Telephone Number(s): 734-777-7317	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		14. Locations Inspected: <input checked="" type="checkbox"/> Main Office <input type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 04/29/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

ISC - Inspection Services Company was a small engineering firm authorized to possess portable moisture density gauges at a storage area inside a multi-tenant light industrial facility in Plymouth, Michigan, and to use them at temporary job sites in NRC jurisdiction for measuring the physical properties of construction materials. At the time of the inspection, the licensee had three Troxler 3400 series gauges and two individuals authorized to use them. The RSO (the owner of the company) was the only active AU; he last used a gauge in October 2021, but expected to resume using them again in summer 2022 through 2023 to finish existing projects.

The inspector attempted this inspection unannounced on April 4, 2022. However, licensee personnel were not present at the time. Other personnel at the facility showed the inspector the licensee's storage area. All entrances to this area were secured, and independent surveys around the area found no exposures distinguishable from background in unrestricted areas. The inspector thereafter announced the inspection to the licensee's RSO.

The inspector returned to the facility on April 29, 2022 and toured the storage area with the RSO. The area was adequately posted, and gauges were adequately secured behind at least two barriers. Independent and confirmatory surveys of the gauges found no unusual readings, and confirmed the function of the licensee's meter. The gauges and their transport cases were in good condition and adequately labeled. The inspector was unable to observe the conduct of licensed activities, as none were scheduled or in-progress. Instead, the RSO demonstrated the implementation of measures for safe transport and use of licensed material. The inspector reviewed the licensee's utilization logs, shipping papers, sealed source leak test results, training records, and annual audits.

During a review of records, the inspector identified a repeat violation of 10 CFR 71.5(a) for failing to provide hazmat training every three years, as required by 49 CFR 172.704(c)(2). The licensee's RSO and sole active hazmat employee had not taken this training since March 11, 2016; the inactive user had not taken this training since July 13, 2015 and had transported gauges more than three years after that date. The licensee had previously been cited by the NRC in IR 03034203/2014001(DNMS) for the same violation. The root cause of the violation this time was an oversight, with poor tracking mechanisms a contributing factor. As corrective action, on May 6, 2022, the licensee's sole active hazmat employee completed hazmat training. The licensee also set additional reminders for each employee to complete it again every three years, including additional emphasis in its program audit form, and committed to provide hazmat training to the inactive employee if and when he returned to work, who at the time of exit on July 20, 2022 had yet to do so.