NRC FORM 592M (10-2020)					U.S. NU	CLEAR REGULATORY COMMISSION	
Materials Inspection Record							
1. Licensee Name: 2. Doc			Docket Number(s):		3. Licens	3. License Number(s)	
City of KCMO Public Works Department 030-)30-08790		24-15241-01		
4. Report Number(s):			5. Date(s) of Inspection:				
2022-001			July 28, 2022; exit August 19, 2022				
6. Inspector(s):			7. Program Code(s):		8. Priority:	9. Inspection Guidance Used:	
Ryan Craffey			03121		5	IP 87124	
10. Licensee Contact Name(s): 11. Licensee E-mail Address:				12. Licensee Telephone Number(s):			
Reggie Davis - RSO	reggie.dav	vis@kcmo.c	org		816-513-4712		
13. Inspection Type: 📃 Initial 14. Lo	Locations Inspected: 15. Next Inspection I			15. Next Inspection	Date (MM/DD/YY	YY):	
Routine Announced 🖌 I	Main Office	Field	I Office	07/28/2025 Normal Extended		Normal Extended	
Non-Routine ✓ Unannounced ☐ T	Temporary Job	Site Rem	ote			✓ Reduced No change	

16. Scope and Observations:

The City of Kansas City, Missouri's Public Works Department was authorized to store portable moisture density gauges containing byproduct material at its Materials Testing Laboratory, and to use them for measuring the physical properties of materials at temporary job sites in NRC jurisdiction. At the time of the inspection, the licensee had two Troxler 3400 series gauges and five individuals authorized to use them. The laboratory's manager served as RSO.

The inspector toured the laboratory in Kansas City. All areas were adequately posted, and all licensed material was adequately secured behind at least two barriers. Independent surveys outside the storage room with one gauge in storage were well below regulatory limits for dose to members of the public. The gauge in storage was in good condition; however its case was not adequately marked or labeled. One Yellow-II label was no longer legible and the UN 3332 marking had fallen off. Independent surveys of the gauge were consistent with radiation profiles in the applicable SSDR safety evaluation, adjusted for decay. The inspector interviewed one gauge user to discuss the safe use of portable gauges, as well as another returning from a job site to discuss the safe transport of gauges. The inspector found both users to be knowledgeable of radiation protection principles and safe use practices for portable gauges. The inspector found that the latter user's transport case had been adequately blocked and braced, however its UN 3332 marking was also missing. This was cited as a SLIV violation of 10 CFR 71.5(a) for failure to comply with 49 CFR 172.301(a)(1).

The inspector reviewed a selection of records and interviewed the RSO to evaluate the oversight of the radiation safety program. Utilization logs were maintained as required, as were shipping papers and emergency response information for each gauge. However, the inspector found that the most recent sealed source leak tests were from March 9, 2020 (a SLIV violation of LC 13.A), the last physical inventory was on January 16, 2019 (a SLIV violation of LC 15), and the last audit of the program was on August 14, 2017 (a SLIV violation of 10 CFR 20.1101(c)). The licensee did not provide copies of its O&E procedures to each gauge user and at each job site (a SLIV violation of LC 19.A), as none were present at the facility, in gauge cases or binders, or in the possession of the RSO or gauge users. Documentation of gauge safety training was located for all users; however, the most recent hazmat training for any user was from 2007, and neither the RSO nor the gauge users present could recall having taking this training within the last three years. This was also cited as a SLIV violation of 10 CFR 71.5(a) for failure to comply with 49 CFR 172.704(c)(2).

The inspector noted that until approximately 2019 the program had been effectively overseen. However, after the former longtime RSO passed away in late 2019, oversight diminished markedly after the laboratory manager was assigned the role on top of other duties. Though the manager had previous experience using portable gauges, he

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appeared unfamiliar with many of the programmatic requirements cited. The inspection interval was therefore reduced for poor performance; specifically with regard to oversight of the program.

At the time of the exit meeting on August 19, 2022, the licensee had replaced the labels and markings on both gauge cases, had ordered leak test kits for its gauges, and had committed to use the former RSO's templates for physical inventories and program audits. The licensee is still in the process of developing and implementing corrective actions to restore compliance and address the potential for recurrence of all six violations; therefore a written response to the NOV will be required.