



Materials Inspection Record

1. Licensee Name: Tyme Engineering, Inc.		2. Docket Number(s): 030-36599		3. License Number(s) 21-32523-01	
4. Report Number(s): 2022-002			5. Date(s) of Inspection: September 7, 2022		
6. Inspector(s): Ryan Craffey		7. Program Code(s): 03121	8. Priority: 5	9. Inspection Guidance Used: IP 87139	
10. Licensee Contact Name(s): Brian Hibdon - RSO		11. Licensee E-mail Address: brianh@tymeengineering.com		12. Licensee Telephone Number(s): 586-405-6160	
13. Inspection Type:		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input type="checkbox"/> Unannounced		<input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		07/07/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

Tyme Engineering was an engineering consulting firm authorized to store portable moisture density gauges containing byproduct material at its office in Livonia, Michigan, 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 20 Troxler 3400 series gauges and 32 individuals authorized to use them. All of the licensee's work with gauges was in southeast and south-central Michigan, the vast majority of which was for MDOT road construction projects. The licensee's RSO, based in Livonia, was authorized for non-routine maintenance of gauges.

The inspector toured the office in Livonia. All 20 of the licensee's gauges were in use in the field at the time of the inspection. The storage location appeared adequate for the safe and secure storage of this many gauges, and was posted as required. No occupied areas or assigned workstations were located in its vicinity. The inspector reviewed all current utilization logs, and confirmed that a selection of gauges were in the possession of the users who signed them out that day. The inspector interviewed the RSO to discuss the storage, use and tracking of portable gauges, and non-routine maintenance and response to emergencies. The inspector confirmed that the licensee still possessed a calibrated TroxAlert survey meter, and reviewed a selection of records including leak test results, program audits, physical inventories, radiation safety training and initial and refresher hazmat training.

During a review of utilization logs, the inspector noted that three gauges had been assigned to an office on Pine Tree Road in Lansing, a storage location not authorized by LC 10. The RSO stated that the company opened the office in 2021, and beginning in May 2022, the licensee began storing gauges there for use on various construction projects in south-central Michigan. The inspector visited the office in Lansing, and confirmed that two gauges were currently stored there (a third was in the field but was expected to return later that day). One gauge was recently and routinely dispatched to a project on I-496 in Lansing, the second to a project on I-69 in Charlotte, and the third to various locations in Jackson and Charlotte. The area was adequately posted, and both gauges were adequately secured behind at least two barriers. No occupied areas or assigned workstations were located in the vicinity of the gauge storage area, and dose rates as confirmed by independent surveys were well below regulatory limits to members of the public. Given that there was little or no radiological or programmatic significance to the unauthorized storage of gauges here, it was considered a SLIV violation of 10 CFR 30.34(c).

The root cause of the violation was a misunderstanding of regulatory requirements; the licensee believed that since all three gauges were stored there temporarily (for use at various job sites), the office could be considered a temporary job site. As corrective action, the licensee committed to submit a license amendment request to add the Lansing location to the license. Since it has yet to do so at time of exit, a written response to the NOV was required.