



Materials Inspection Report

1. Licensee/Location Inspected: Atlas Technical Consultants LLC 7988 Centerpoint Dr. Ste. 100 Indianapolis, IN 46256 Report Number(s) 2022001	2. NRC/Regional Office Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. Docket Number(s) 030-13245	4. License Number(s) 13-17732-01	5. Date(s) of Inspection 07/24/2022 - 9/2/2022

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. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements, and were assessed at Severity Level IV, in accordance with the NRC Enforcement Policy.

A. 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, corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy were satisfied.
 (Non-cited violation(s) was/were discussed involving the following requirement(s)
 Two NCV's were identified as a result of this inspection and are cited on the next page.

B. The following violation(s) is/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)

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 AND DATE
LICENSEE'S REPRESENTATIVE	AARON DANIELS RSO	9-21-22
NRC INSPECTOR	Elizabeth Tindle-Engelmann/ Luis Nieves	Elizabeth D. Tindle-Engelmann <small>Digitally signed by Elizabeth D. Tindle-Engelmann Date: 2022.09.20 14:49:48 -0500</small> Luis A. Nieves Folch <small>Digitally signed by Luis A. Nieves Folch Date: 2022.09.20 14:41:10 -0500</small>
BRANCH CHIEF	Michael Kunowski	Michael A. Kunowski <small>Digitally signed by Michael A. Kunowski Date: 2022.09.21 06:18:05 -0500</small>

Materials Inspection Report (Continued)

A. Condition 15 of Amendment 37 of License No. 13-17732-01 requires, in part, that the licensee shall conduct a physical inventory every 6 months to account for all sealed sources and/or devices received and possessed under the license.

Contrary to the above, from April 23, 2020, to November 4, 2020, the licensee failed to conduct a physical inventory every 6 months to account for all sealed sources and/or devices received and possessed under the license. Specially, for a period greater than 6 months the licensee failed to account for all sealed sources and/or devices received and possessed under the license.

The licensee identified this failure during a program review and attributed the cause to a change in management. As a corrective action the licensee implemented a reminder system to ensure that physical inventories are performed at least every 6 months to account for all sealed sources and/or devices received and possessed under the license.

B. Condition 13.A of Amendment 37 of License No. 13-17732-01 requires, in part, that sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certification of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. The licensee possessed multiple Troxler 3400 series portable surface moisture and density gauges for which the certification of registration issued by an Agreement State states the source shall be tested for leakage at an interval not to exceed 12 months.

Contrary to the above, from February 19, 2021, through March 3, 2022, the licensee failed to test sealed sources for leakage and/or contamination at intervals not to exceed the intervals specified in the certification of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State.

Specially, for a period greater than 12 months the licensee failed to test Troxler 3400 series portable surface moisture and density gauges sealed sources for leakage and/or contamination at intervals not to exceed 12 months as specified in the certification of registration issued by North Carolina Agreement State, NC-646-D-130-S.

The licensee identified this failure during a program review and attributed the cause to scheduling contains with their service provider. As a corrective action the licensee obtained sealed source leak test kits so that they could collect the leak test sample to be analyzed by the service provider if future scheduling issues arise.



Materials Inspection Record

1. Licensee Name: Atlas Technical Consultants LLC		2. Docket Number(s): 030-13245		3. License Number(s) 13-17732-01	
4. Report Number(s): 2022001			5. Date(s) of Inspection: 07/24/2022 - 9/2/2022		
6. Inspector(s): Elizabeth Tindle-Engelmann/Luis Nieves		7. Program Code(s): 03121	8. Priority: 5	9. Inspection Guidance Used: 87124	
10. Licensee Contact Name(s): Aaron Daniels, RSO		11. Licensee E-mail Address: aaron.daniels@oneatlas.com		12. Licensee Telephone Number(s): 765-748-6875	
13. Inspection Type: <input type="checkbox"/> Initial		14. Locations Inspected:		15. Next Inspection Date (MM/DD/YYYY):	
<input checked="" type="checkbox"/> Routine <input checked="" type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		<input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input checked="" type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		07/24/2027 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	

16. Scope and Observations:

This was a partially announced and partially unannounced inspection of an engineering company that was authorized by its NRC Materials license to use and store portable moisture density gauges for measuring physical properties of materials anywhere in areas of NRC jurisdiction. The licensee had a main location in Indianapolis and 4 other permanent storage locations: in Evansville, Highland, Lafayette, and Lawrenceburg, Indiana; in addition, the licensee regularly uses gauges at two ash landfills. The licensee employed 14 gauge users and possessed one Troxler Model 3216 gauge, 4 CPN Model MC1DR gauges, and 18 Troxler Model 3430 gauges. The licensee did not perform any services or maintenance activities on its gauges; these service were performed by the manufacturer. The licensee used its gauges year-round. The inspector visited the main location in Indianapolis and one of the ash landfill sites (in New Albany, Indiana). At the New Albany location, the licensee stored 2 gauges in a conex container with two barriers and performed density measurements on the landfill almost daily. The second inspector visited the Highland location which had three gauge users who performed work on a weekly basis.

Performance Observations

The licensee demonstrated gauge use, ALARA practices, and gauge security during transport and storage at field office and temporary job sites. The gauges were kept under two barriers when not under constant surveillance. The licensee had the required shipping papers that contained appropriate information; the licensee demonstrated how the papers were made accessible in the transport vehicle. An operator demonstrated an adequate level of understanding of emergency and handling procedures during interviews. The inspectors reviewed sealed source leak tests, sealed source inventories, training, dosimetry, survey meter calibrations, program reviews, and gauge usage logs.

During the previous inspection, a violation for the licensee's failure to maintain constant surveillance of a portable gauge was identified. The inspectors reviewed the licensee's corrective actions by interviewing the RSO and gauge user. This violation is closed.

The inspectors identified two non-cited violations of NRC requirements during this inspection, concerning 1) failure to perform sealed source inventories and 2) failure to perform sealed source leak tests. The licensee identified both of these issues during program reviews.

1) License condition 15 of Amendment 37 of License No. 13-17732-01 requires that the licensee conduct a physical

Materials Inspection Record (Continued)

inventory every 6 months to account for all sealed sources and/or devices received and possessed under the license. Contrary to this, from April 23, 2020, to November 4, 2020, the licensee failed to conduct a physical inventory at the Highland, Indiana location to account for all sealed sources and/or devices received and possessed under the license. The licensee identified this failure during a program review and attributed the cause to a change in management. As a corrective action, the licensee implemented a reminder system to ensure that physical inventories are performed at least every 6 months.

2) License condition 13.A of Amendment 37 of License No. 13-17732-01 requires that sealed sources be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certification of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. Certificate of registration NC-646-D130-S (issued by the North Carolina Agreement State) for Troxler Model 3400 gauges specifies that the sources be tested for leakage at an interval not to exceed 12 months. Contrary to this, from February 19, 2021, through March 3, 2022, the licensee failed to test the sealed sources of its Troxler 3400 series gauges at the Highland, Indiana location for leakage and/or contamination at intervals not to exceed 12 months. The licensee identified this failure during a program review and attributed the cause to a scheduling issue with their service provider. As a corrective action, the licensee obtained sealed source leak test kits so that they could collect leak test samples to be analyzed by the service provider if future scheduling issues arise.

From: [Aaron Daniels](#)
To: [Luis Nieves Folch](#)
Cc: [Gregory Fiedorowicz](#)
Subject: [External_Sender] RE: NRC 591 clear report
Date: Wednesday, September 21, 2022 9:02:32 AM
Attachments: [image001.png](#)
[NRC Form 591 - signed by Atlas.pdf](#)
Importance: High

Luis,

Attached is the signed form 591 for your records. A copy is being sent to Greg Fiedorowicz our RSO for Atlas as well.

Let me know if you need anything else.

Thanks



Aaron Daniels
CMT Project Manager
O: 317.579.4093 C: 765.748.6875

From: Luis Nieves Folch <Luis.NievesFolch@nrc.gov>
Sent: Wednesday, September 21, 2022 9:53 AM
To: Aaron Daniels <aaron.daniels@oneatlas.com>
Subject: [EXTERNAL] NRC 591 clear report

[External Email] This email originated from outside of the Atlas mail system. Please use caution when opening attachments.

Dear Mr. Daniels

Attach is the clear 591 report for the inspection conducted on July 24, 2022 to September 2, 2022. You need to sign at the bottom where it says “LICENSEE’S REPRESENTATIVE” acknowledging the Non-cited violations and email back to me. After that there is no further actions on your part.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC’s “Rules of Practice,” a copy of this message will be available electronically for public inspection in the NRC’s Public Document Room or from the NRC’s Agencywide Documents Access and Management System (ADAMS), accessible from the NRC’s website at <http://www.nrc.gov/reading-rm/adams.html>.

Please feel free to contact me if you have any questions regarding this correspondence.

Thank you,

**Luis Nieves
Health Physicist
U.S. Nuclear Regulatory Commission**

Division of Nuclear Materials Safety

Office: (630) 829-9571

Fax: (630) 515-1259

This message and any attachments are intended only for the use of the addressee and may contain information that is privileged and/or confidential. If the reader of the message is not the intended recipient or an authorized representative of the intended recipient, you are hereby notified that any use and/or dissemination of any of this communication is strictly prohibited. If you have received this communication in error, notify the sender immediately by return email and delete the message and any attachments from your system.