

NRC FORM 591M  
(04-2022)

U.S. NUCLEAR REGULATORY COMMISSION

## Materials Inspection Report

## 1. Licensee/Location Inspected:

H & H X-Ray Services, Inc.  
104 Enterprise Street  
West Monroe, Louisiana 71292

Report Number(s) 2022-001

## 2. NRC/Regional Office

Region IV  
U. S. Nuclear Regulatory Commission  
1600 E. Lamar Boulevard  
Arlington, TX 76011-4511

## 3. Docket Number(s)

030-17191

## 4. License Number(s)

17-19236-01

## 5. Date(s) of Inspection

August 3 - October 26, 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))
- 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)

Violations on Next Page

## 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 | Toby Head                   |  10/26/22                         |
| NRC INSPECTOR             | Janine F. Katanic, PhD, CHP | Janine F. Katanic<br><small>Digitally signed by Janine F. Katanic<br/>Date: 2022.10.26 13:55:30 -05'00'</small>       |
| BRANCH CHIEF              | Lizette Roldán-Otero, PhD   | Lizette Roldan-Otero<br><small>Digitally signed by Lizette Roldan-Otero<br/>Date: 2022.11.08 06:53:34 -06'00'</small> |

Add Continuation Page

## Materials Inspection Report (Continued)

### Violation A.

10 CFR 34.29(b) requires that the licensee shall maintain records of the quarterly inventory in accordance with 10 CFR 34.69.

10 CFR 34.69(b) requires, in part, the record must include the date of the inventory, name of the individual conducting the inventory, radionuclide, number of becquerels (curie) or mass (for depleted uranium (DU)) in each device, location of sealed source and/or devices, and manufacturer, model, and serial number of each sealed source and/or device, as appropriate.

Contrary to the above, from February 28, 2021, to August 3, 2022, the licensee failed to maintain records of quarterly inventory in accordance with 10 CFR 34.69. Specifically, the licensee's quarterly inventory records failed to include the radionuclide, mass of DU in devices not containing a sealed source, and manufacturer of each sealed source and/or device.

As corrective actions, following the inspection, the licensee modified their inventory record template to include the radionuclide and manufacturer of each sealed source and/or device, and to include the mass of DU for the devices that did not contain sources.

This is a Severity Level IV violation (Enforcement Policy 6.3.d)

### Violation B.

License Condition 14.A. of NRC Materials License No. 17-19236-01, Amendment No. 33, requires in part, that no sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

Contrary to the above, from August 23, 2010, to August 3, 2022, the licensee stored a sealed source for a period of more than 10 years and failed to perform a test for leakage and/or contamination. Specifically, on August 23, 2010, the licensee performed a test for leakage and/or contamination of a cesium-137 sealed source, source serial number S-244, and placed it into storage, and as of August 3, 2022, the source had not been tested for leakage and/or contamination, a period exceeding 10 years.

As corrective actions, the licensee tested the sealed source for leakage on August 10, 2022. The results of the leak test were provided to the inspectors on August 16, 2022, and showed that leakage was below the required limits. Following the inspection, on October 5, 2022, the source was transferred to an authorized recipient for disposal.

This is a Severity Level IV violation (Enforcement Policy 6.7.d.4)

## Kyle Bischoff

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**From:** Cary Tarver <ct@hhxray.com>  
**Sent:** Wednesday, October 26, 2022 2:20 PM  
**To:** Kyle Bischoff  
**Cc:** Janine Katanic  
**Subject:** [External\_Sender] RE: NRC Inspection Report / H&H X-Ray  
**Attachments:** NRC 591M.pdf

Kyle,

Per our conversation, see attached file. Please let me know if we may be of additional assistance.

Respectfully,  
Cary D. Tarver, Compliance Manager  
H & H X-Ray Services, Inc.  
800.551.5093

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**From:** Kyle Bischoff <Kyle.Bischoff@nrc.gov>  
**Sent:** Wednesday, October 26, 2022 2:11 PM  
**To:** ct@hhxray.com  
**Cc:** Janine Katanic <Janine.Katanic@nrc.gov>  
**Subject:** NRC Inspection Report / H&H X-Ray

Cary,  
Attached is the inspection report. As discussed, please review the violations and corrective actions described on page 2. If you do not contest the violations please have the RSO sign the form and email me a signed copy.

If you have any questions or concerns please reach out.

Thanks,

*Kyle Bischoff*

Health Physicist  
U.S. Nuclear Regulatory Commission  
Region IV  
Division of Radiological Safety and Security  
Materials Inspection Branch  
Office: 817-200-1259  
Email: [Kyle.Bischoff@nrc.gov](mailto:Kyle.Bischoff@nrc.gov)