

NRC FORM 591M
(04-2022)

U.S. NUCLEAR REGULATORY COMMISSION

Materials Inspection Report

1. Licensee/Location Inspected:

High Country Fabrication
1000 West 1st Street
Casper, WY 82604

Report Number(s) 2023-001

2. NRC/Regional Office

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

3. Docket Number(s)

030-37748

4. License Number(s)

49-29300-01

5. Date(s) of Inspection

March 30 - April 12, 2023

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)

10 CFR 34.43(d) requires the licensee shall provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.

Contrary to the above, from January 2022 to March 30, 2023, the licensee failed to provide annual refresher safety training for each radiographer and radiographer's assistant at intervals not to exceed 12 months.

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	Gary Chris Franklin Jr.	<i>Gary Chris Franklin Jr.</i>
NRC INSPECTOR	Jason Dykert	Jason C. Dykert <small>Digitally signed by Jason C. Dykert Date: 2023.04.19 09:20:13 -0700</small>
BRANCH CHIEF	Lizette Roldán-Otero, Ph.D.	Lizette Roldan-Otero <small>Digitally signed by Lizette Roldan-Otero Date: 2023.05.25 09:00:43 -05'00'</small>

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Materials Inspection Report (Continued)

Specifically, a period in excess of 12 months was exceeded for providing annual refresher training because the training was not completed in calendar year 2022. The licensee corrected this violation by providing annual refresher safety training and documenting the training in accordance with the record requirements in 10 CFR 34.79(d), within 30 days of the inspection.

10 CFR 34.27(c)(1) requires, in part, that each licensee who uses a sealed source shall have the source tested for leakage at intervals not to exceed 6 months.

Contrary to the above, as of March 30, 2023, the licensee failed to have sealed sources tested for leakage at intervals not to exceed 6 months. Specifically, the licensee failed to leak test two iridium-192 sealed sources within the required 6-month interval: the 1st source was initially leak tested in December 2021 but wasn't leak tested again until October 2022; and the 2nd source was initially leak tested in May 2022 but wasn't leak tested again until it was returned to the manufacturer in December 2022, both sources' leak tests exceeded 6 month intervals.

The licensee's leak tests were current at the time of inspection, and the licensee committed to preventing recurrence by setting electronic calendar reminders to help identify when sealed sources are coming due for the 6 month leak test interval.

Jason Dykert

From: Jason Dykert
Sent: Thursday, April 13, 2023 9:28 AM
To: gary.franklin@hicofab.com
Cc: Mohammed Kawasmi
Subject: NRC Inspection Report 2023-001
Attachments: IR 030-37748-2023-001; High Country Fabrication; 591M print.pdf

Good morning Mr. Franklin,

As we discussed yesterday two violations of NRC requirements are documented in the attached NRC inspection report. Please review the report and the corrective actions described within it, then sign it and email it back to me.

After my branch chief signs the report, it will be a publicly available safety record available for review in the NRC's Agencywide Documents Access and Management System ([ADAMS](#)) online database. If you have any questions please let me know.

Respectfully,

Jason Dykert
Health Physicist
Materials Inspection
U.S. NRC - Region IV
Phone: 817-200-1427