



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD, SUITE 102  
KING OF PRUSSIA, PA 19406-1415

June 14, 2023

EA-23-016

Ranfy Almonte Cartegena  
Almonte Geo Service Group  
Calle 46, 3m18  
Alturas de Bucarabones  
Toa Alta, Puerto Rico 00953

**SUBJECT:** ALMONTE GEO SERVICE GROUP, NRC INSPECTION REPORT NO.  
03038488/2023001

Dear Ranfy Almonte Cartegena:

During the period between March 1, 2023, and June 14, 2023, the U.S. Nuclear Regulatory Commission (NRC) attempted to conduct NRC inspection 2023001 of Almonte Geo Service Group (Almonte). The inspection was to evaluate your response to the Notice of Violation (Notice) issued to Almonte on February 1, 2023 (ML23004A164).<sup>1</sup> The enclosed report (Enclosure 1) documents the attempted NRC inspection.

The Notice documented Almonte's failure to comply with the requirements of the NRC Order Revoking License within 20 Days Based on Nonpayment of License Fees (Order), dated September 1, 2015 (ML15246A146). The Order notified you that Almonte's NRC License No. 52-31453-01 was revoked, effective September 21, 2015, unless you paid all debts due to the NRC. Because you did not pay the debts, in accordance with the Order, Almonte was required to dispose of, or transfer to another authorized recipient, all NRC-licensed material within 60 days of the date of revocation (i.e., by November 20, 2015). Almonte initiated decommissioning activities on December 2, 2019, by transferring two CPN-131 portable gauges to an authorized recipient. However, during a site visit on November 22, 2022, NRC staff verified that you continued to possess a Seaman Nuclear Corporation Model C-300 portable gauge containing approximately 5.5 mCi of Ra-226 that had been authorized by Almonte's NRC license. Therefore, the NRC staff issued the Notice documenting the NRC's determination that Almonte's failure to meet its obligation to dispose of or transfer its licensed material constituted a violation of the Order.

In the cover letter transmitting the Notice, the NRC staff provided contact information for the Conference of Radiation Control Program Directors, Inc. (CRCPD), an independent organization that provides information on radioactive source disposal options and recycling events that may be available at a reduced cost.

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<sup>1</sup> Designation in parentheses refers to an Agency-wide Documents Access and Management System (ADAMS) accession number. Documents referenced in this letter are publicly-available using the accession number in ADAMS.

You have not responded to the Notice or to communication attempts by NRC inspectors, including through text and voice messages to your personal telephone number. The NRC staff has no evidence that, following the Notice issued on February 1, 2023, you have corresponded with the CRCPD or any other radioactive waste service providers in Puerto Rico to aid with your disposal efforts. The Decommissioning Timeliness Rule described in Title 10 of the *Code of Federal Regulations* (10 CFR) 30.36(h) requires that licensees shall complete decommissioning of the site as soon as practicable but no later than 24 months following the initiation of decommissioning. However, based on the results of the attempted inspection, the NRC staff has identified an apparent violation for Almonte's failure to complete decommissioning. This apparent violation is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. The current Enforcement Policy is available on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

Because Almonte received prior escalated enforcement action within the past two years and has not taken corrective action for this current apparent violation, the enforcement action would include a proposed civil penalty of approximately \$17,500. As noted in Section 2.3.4 of the Enforcement Policy, the NRC may exercise discretion and assess a separate violation and attendant civil penalty up to the statutory limit for each day the violation continues. The NRC may exercise this discretion when a licensee is aware of a violation of at least moderate significance and had a clear opportunity to prevent, identify and correct the violation but failed to do so.

The NRC's primary interest in this matter is that Almonte meets its obligation to ensure the proper transfer or disposal of the licensed material. Accordingly, the NRC will not propose a civil penalty if, within **60** days of the date of this letter, you complete the proper transfer or disposal of the Seaman Nuclear Corporation C-300 portable gauge. After completing this action, Almonte must send a copy of the certification from the authorized recipient that the material has been received to the Regional Administrator, NRC Region I, 475 Allendale Road, Suite 102, King of Prussia, PA 19406.

In lieu of properly transferring or disposing of the licensed material, you may respond to this letter before the NRC makes its enforcement decision. Namely, you may (1) request a Pre-Decisional Enforcement conference (PEC) or (2) respond in writing to the apparent violation addressed in this report within **30** days of the date of this letter. You may also choose to accept the apparent violation as characterized in this letter and its enclosure, in which case, the NRC will proceed with its enforcement action and propose the appropriate civil penalty if you do not dispose of the licensed material as described above.

If you choose to request a PEC, the meeting would be held in our office in King of Prussia, PA, within **30** days of the date of this letter. The conference will provide an opportunity for you to provide your perspective on these matters and any other information that you believe the NRC should take into consideration in making an enforcement decision. The topics discussed during the PEC may include information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned. In presenting any corrective actions, you should be aware that the promptness and comprehensiveness of the actions will be considered in assessing any civil penalty for the apparent violation. The guidance in the enclosed excerpt from NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," (Enclosure 2) may be helpful. The PEC would be open for public observation, and the NRC would issue a press release to announce the conference time and date.

If you choose to provide a written response, it should be sent to the NRC within **30** days of the date of this letter. It should be clearly marked as a "Response to Apparent Violation in NRC inspection Report No. 03038488/2023001; EA-23-016," and should include for each apparent violation: (1) the reason for the apparent violation or, if contested, the basis for disputing the apparent violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previously docketed correspondence if the correspondence adequately addresses the required response. Additionally, your response should be sent to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region I, 475 Allendale Road, Suite 102, King of Prussia, PA 19406, within 30 days of the date of this letter. If an adequate response is not received within the time specified or an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision or schedule a PEC.

Please contact Chris Cahill, Chief, Commercial, Industrial, R&D, and Academic Branch, NRC Region I, at 610-337-5108 within **10** days of the date of this letter to notify the NRC of whether Almonte Geo Service Group will dispose of or transfer the gauge or to notify the NRC whether you are interested in attending a PEC or providing a written response. If you do not contact the NRC within the time specified, and an extension of time has not been granted by the NRC, the NRC will proceed with its enforcement decision.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response if you choose to provide one will be made available electronically for public inspection in the NRC Public Document Room and from the NRC Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-material-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

If you have any questions related to this matter, please contact Steve Shaffer of my staff at 610-337-5225 or [steve.shaffer@nrc.gov](mailto:steve.shaffer@nrc.gov).

Sincerely,

Paul G. Krohn  Digitally signed by Paul G. Krohn  
Date: 2023.06.14 15:04:02 -04'00'

Paul G. Krohn, Director  
Division of Radiological Safety and Security

Enclosures:

1. NRC Inspection Report No. 03038488/2023001
2. NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action"

Docket No. 03038488

License No. 52-31453-01

cc w/Enclosures: Roy Greaves, Director  
Environment, Health, and Safety  
Commonwealth of Puerto Rico

SUBJECT: ALMONTE GEO SERVICE GROUP, NRC INSPECTION REPORT NO.  
03038488/2023001 AND APPARENT VIOLATION DATED JUNE 14, 2023

**DISTRIBUTION:**

J Peralta, OE  
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 M Ford, SAO-RI / F Gaskins, SAO-RI  
 B Klukan, ORA, RI  
 R1Enforcement  
 E Spangler, RI  
 Region I OE Files (with concurrences)

R1DRSSMAILRESOURCE

DOCUMENT NAME: [https://usnrc.sharepoint.com/teams/Region-I-CIRDA/Shared Documents/Branch 2/Enforcement/EA-23-016 Almonte Geo Choice Letter \(002\).docx](https://usnrc.sharepoint.com/teams/Region-I-CIRDA/Shared Documents/Branch 2/Enforcement/EA-23-016 Almonte Geo Choice Letter (002).docx)

ADAMS ACCESSION NO. ML23164A193

<input type="checkbox"/> SUNSI Review/ MMM		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI:DRSS	RI:ORA	RI:DRSS	RI:ORA	RI:ORA
NAME	SShaffer	MMcLaughlin	CCahill	RSusko NLO	JNick
DATE	5/17/23	5/17/23	5/18/23	5/23/23	5/30/23
OFFICE	OE	NMSS	OGC	RI:DRSS	
NAME	J Peralta	M Burgess	L Baer NLO	PKrohn	
DATE	6/02/23	6/09/23	6/05/23	6/14/23	

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

INSPECTION REPORT

Inspection No. 03038488/2023001  
EA No. EA-23-016  
Docket No. 03038488  
License No. 52-31453-01  
Licensee: Almonte Geo Service Group  
Address: Calle 46, 3m18  
Alturas de Bucarabones  
Toa Alta, Puerto Rico 00953

Authorized Storage Location  
Calle 46, 3m18  
Alturas de Bucarabones  
Toa Alta, Puerto Rico 00953

Inspection Date: Remote inspection was attempted. Licensee did not respond to communication attempts. Last communication attempt was made on May 8, 2023.

Inspector: \_\_\_\_\_  
Steve Shaffer, Sr. Health Physicist  
Commercial, Industrial, R&D and  
Academic Branch  
Division of Radiological Safety and Security  
\_\_\_\_\_ date

Approved By: \_\_\_\_\_  
Christopher G. Cahill, Chief  
Commercial, Industrial, R&D and  
Academic Branch  
Division of Radiological Safety and Security  
\_\_\_\_\_ date

## EXECUTIVE SUMMARY

Almonte Geo Service Group  
NRC Inspection Report  
No. 03038488/2023001

Almonte Geo Service Group (licensee) is a portable gauge licensee in Northern Puerto Rico that is authorized under NRC License No. 52-31453-01 to possess two CPN-131 portable gauges, each containing approximately 10 mCi of Cs-137 and approximately 40 mCi of Am-241 and one Seaman Nuclear Corporation Model C-300 portable gauge containing approximately 5.5 mCi of Ra-226. The licensee has not conducted licensed activities since May 2013.

On September 1, 2015, the NRC issued to Almonte Geo Service Group Order LFB-15-0355, "Order Revoking License Within 20 days Based on Nonpayment of License Fees" (Order) (ML15246A146). The Order notified the licensee that its NRC license was revoked, effective 20 days from the date of the Order (i.e., September 21, 2015), unless within the 20-day period, the licensee paid all debts due to NRC. After revocation, licensed activities were limited to decommissioning and safe, secure storage or transfer of material. The Order further stated that within 60 days of the date of revocation (i.e., by November 21, 2015), the licensee must dispose of or transfer all NRC-licensed material and request termination of its license. Almonte Geo Service Group failed to pay the applicable fees within the 20-day period and failed to dispose or transfer all licensed materials within 60 days of the date of revocation.

NRC staff visited Almonte Geo Service Group's facility in 2019 to verify storage of the licensed material. The NRC staff provided the licensee guidance on how to register its gauges with the Conference of Radiation Control Program Directors (CRCPD) Source Collection and Threat Reduction (SCATR) program, and how to obtain assistance in disposing of the gauges. The NRC staff also provided a list of portable gauge suppliers who may have interest in receiving the gauges and provided guidance on how to use NRC's Agencywide Documents Access and Management System (ADAMS) to locate other portable gauge licensees who may have an interest in receiving the gauges.

Ranfy Almonte Cartagena of Almonte Geo Service Group stated that the licensee lacked the funds necessary to transfer the gauges and would only participate in the SCATR if was completely free of cost. The licensee subsequently informed the NRC staff that it had identified an authorized entity (Puerto Rico Asphalt, NRC License No. 52-19845-01) that was willing to accept the two CPN-131 gauges. On December 2, 2019, the region approved an amendment to Puerto Rico Asphalt's license authorizing possession of the gauges (ML20006D735).

In a letter dated August 29, 2022 (ML22241A111), after Almonte Geo Service Group made no progress with disposal or transfer of the remaining Ra-226 gauge, the NRC staff informed the licensee that it was in apparent violation of the 2015 Order and that a civil penalty could potentially be imposed if the licensee did not transfer or dispose of the gauge. On February 1, 2023, after Almonte Geo Service Group failed to correct the apparent violation, the NRC staff issued a Severity Level III Notice of Violation (Notice) (ML23004A164). The NRC staff did not assess a civil penalty because the five-year statute of limitations for the violation had expired. In the cover letter transmitting the Notice, the NRC staff provided contact information for the Conference of Radiation Control Program Directors, Inc. (CRCPD), an independent organization that provides information on radioactive source disposal options and recycling events that may be available at a reduced cost.

To the staff's knowledge, Almonte Geo Service Group has neither responded to the Notice nor communicated with the CRCPD and remains in possession of the Ra-226 gauge. The NRC staff has determined that the licensee initiated decommissioning activities on December 2, 2019, by transferring the CPN gauges. The Decommissioning Timeliness Rule in Title 10 of the *Code of Federal Regulations* (10 CFR) 30.36(h) requires that licensees shall complete decommissioning of the site as soon as practicable but no later than 24 months following the initiation of decommissioning. Given that Almonte Geo Service Group transferred the CPN gauges on or about December 2, 2019, which initiated decommissioning, the 24-month period to complete decommissioning expired December 2, 2021. Therefore, Almonte Geo Service Group is in apparent violation of this requirement.

### **Apparent Violation**

10 CFR 30.36(h) requires, in part, that licensees shall complete decommissioning of the site as soon as practicable but no later than 24 months following the initiation of decommissioning.

Contrary to the above, as of December 2, 2021, Almonte Geo Service Group (Almonte) did not complete decommissioning of the site within 24 months following the initiation of decommissioning. Specifically, Almonte's NRC license was revoked as of September 21, 2015. On or about December 2, 2019, Almonte initiated decommissioning by transferring two of its licensed portable gauges to an authorized NRC licensee. However, Almonte has not disposed of or transferred its remaining licensed portable gauge to complete decommissioning.



## **REPORT DETAILS**

### **Organization and Scope of the Program**

#### 1. Inspection Scope

The inspector made multiple attempts to contact the licensee via phone calls and text messages. The licensee was non-responsive to the attempts.

#### 2. Observations and Findings

Almonte Geo Service Group (Almonte, licensee) is a portable gauge licensee and, to the best of NRC staff's knowledge, currently possesses a portable gauge with approximately 5.5 millicuries of radium-226 despite its NRC license being revoked effective September 21, 2015. On December 2, 2019, the NRC approved an amendment to the NRC license of Puerto Rico Asphalt (NRC License No. 52-19845-01) authorizing possession of Almonte's two CPN-131 gauges, which Almonte transferred to that company.

The NRC staff has determined that the licensee initiated decommissioning on December 2, 2019, when it transferred the CPN gauges to Puerto Rico Asphalt. The Decommissioning Timeliness Rule in Title 10 of the *Code of Federal Regulations* (10 CFR) 30.36(h) requires that licensees shall complete decommissioning of the site as soon as practicable but no later than 24 months following the initiation of decommissioning. Given that Almonte transferred the CPN gauges on or about December 2, 2019, which initiated decommissioning, the 24-month period to complete decommissioning expired December 2, 2021. Therefore, Almonte is in apparent violation of this requirement.

#### 3. Conclusions

Almonte failed to complete decommissioning of its site within 24 months following initiation of decommissioning.

## **PARTIAL LIST OF PERSONS CONTACTED**

NRC Staff  
Steve Shaffer, Senior Health Physicist  
Juan Ayala, Health Physicist

## **INSPECTION PROCEDURES USED**

IP 87124      Fixed and Portable Gauge Programs

## **LIST OF ACRONYMS AND ABBREVIATIONS USED**

ADAMS	Agency-wide Documents Access and Management System
CFR	Code of Federal Regulations
CRCPD	Conference of Radiation Control Program Directors
NRC	United States Nuclear Regulatory Commission
SCATR	Source Collection and Threat Reduction

NOTE: The following information is an updated excerpt from NRC Information Notice 96-28 issued in 1996.

## **NRC INFORMATION NOTICE 96-28**

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS  
WASHINGTON, D.C. 20555

May 1, 1996

NRC INFORMATION NOTICE 96-28:      SUGGESTED GUIDANCE RELATING TO  
DEVELOPMENT AND IMPLEMENTATION OF  
CORRECTIVE ACTION

### Addressees

All material and fuel cycle licensees.

### Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice to provide addressees with guidance relating to development and implementation of corrective actions that should be considered after identification of violation(s) of NRC requirements. It is expected that recipients will review this information for applicability to their facilities and consider actions, as appropriate, to avoid similar problems. However, suggestions contained in this information notice are not new NRC requirements; therefore, no specific action nor written response is required.

### Background

On June 30, 1995, NRC revised its Enforcement Policy, to clarify the enforcement program's focus by, in part, emphasizing the importance of identifying problems before events occur, and of taking prompt, comprehensive corrective action when problems are identified. Consistent with the revised Enforcement Policy, NRC encourages and expects identification and prompt, comprehensive correction of violations.

In many cases, licensees who identify and promptly correct non-recurring Severity Level IV violations, without NRC involvement, will not be subject to formal enforcement action. Such violations will be characterized as "non-cited" violations as provided in Section VI.A of the Enforcement Policy. Minor violations are not subject to formal enforcement action. Nevertheless, the root cause(s) of minor violations must be identified and appropriate corrective action must be taken to prevent recurrence.

If violations of more than a minor concern are identified by the NRC during an inspection, licensees will be subject to a Notice of Violation and may need to provide a written response, as

required by 10 CFR 2.201, addressing the causes of the violations and corrective actions taken to prevent recurrence.

In some cases, such violations are documented on Form 591 (for materials licensees) which constitutes a notice of violation that requires corrective action but does not require a written response. If a significant violation is involved, a predecisional enforcement conference may be held to discuss those actions.

The quality of a licensee's root cause analysis and plans for corrective actions may affect the NRC's decision regarding both the need to hold a predecisional enforcement conference with the licensee and the level of sanction proposed or imposed.

### Discussion

Comprehensive corrective action is required for all violations. In most cases, NRC does not propose imposition of a civil penalty where the licensee promptly identifies and comprehensively corrects violations. However, a Severity Level III violation will almost always result in a civil penalty if a licensee does not take prompt and comprehensive corrective actions to address the violation.

It is important for licensees, upon identification of a violation, to take the necessary corrective action to address the noncompliant condition and to prevent recurrence of the violation and the occurrence of similar violations. Prompt comprehensive action to improve safety is not only in the public interest, but is also in the interest of licensees and their employees. In addition, it will lessen the likelihood of receiving a civil penalty. Comprehensive corrective action cannot be developed without a full understanding of the root causes of the violation.

Therefore, to assist licensees, the NRC staff has prepared the following guidance, that may be used for developing and implementing corrective action. Corrective action should be appropriately comprehensive to not only prevent recurrence of the violation at issue, but also to prevent occurrence of similar violations. The guidance should help in focusing corrective actions broadly to the general area of concern rather than narrowly to the specific violations. The actions that need to be taken are dependent on the facts and circumstances of the particular case.

The corrective action process should involve the following three steps:

1. Conduct a complete and thorough review of the circumstances that led to the violation. Typically, such reviews include:
  - Interviews with individuals who are either directly or indirectly involved in the violation, including management personnel and those responsible for training or procedure development/guidance. Particular attention should be paid to lines of communication between supervisors and workers.
  - Tours and observations of the area where the violation occurred, particularly when those reviewing the incident do not have day-to-day contact with the operation under review. During the tour, individuals should look for items that

may have contributed to the violation as well as those items that may result in future violations. Reenactments (without use of radiation sources, if they were involved in the original incident) may be warranted to better understand what actually occurred.

- Review of programs, procedures, audits, and records that relate directly or indirectly to the violation. The program should be reviewed to ensure that its overall objectives and requirements are clearly stated and implemented. Procedures should be reviewed to determine whether they are complete, logical, understandable, and meet their objectives (i.e., they should ensure compliance with the **current** requirements). Records should be reviewed to determine whether there is sufficient documentation of necessary tasks to provide an record that can be audited and to determine whether similar violations have occurred previously. Particular attention should be paid to training and qualification records of individuals involved with the violation.

2. Identify the root cause of the violation.

Corrective action is not comprehensive unless it addresses the root cause(s) of the violation. It is essential, therefore, that the root cause(s) of a violation be identified so that appropriate action can be taken to prevent further noncompliance in this area, as well as other potentially affected areas. Violations typically have direct and indirect cause(s). As each cause is identified, ask what other factors could have contributed to the cause. When it is no longer possible to identify other contributing factors, the root causes probably have been identified. For example, the direct cause of a violation may be a failure to follow procedures; the indirect causes may be inadequate training, lack of attention to detail, and inadequate time to carry out an activity. These factors may have been caused by a lack of staff resources that, in turn, are indicative of lack of management support. Each of these factors must be addressed before corrective action is considered to be comprehensive.

3. Take prompt and comprehensive corrective action that will address the immediate concerns **and** prevent recurrence of the violation.

It is important to take immediate corrective action to address the specific findings of the violation. For example, if the violation was issued because radioactive material was found in an unrestricted area, **immediate** corrective action must be taken to place the material under licensee control in authorized locations. After the immediate safety concerns have been addressed, timely action must be taken to prevent future recurrence of the violation. Corrective action is sufficiently comprehensive when corrective action is broad enough to reasonably prevent recurrence of the specific violation as well as prevent similar violations.

In evaluating the root causes of a violation and developing effective corrective action, consider the following:

1. Has management been informed of the violation(s)?

2. Have the programmatic implications of the cited violation(s) and the potential presence of similar weaknesses in other program areas been considered in formulating corrective actions so that both areas are adequately addressed?
3. Have precursor events been considered and factored into the corrective actions?
4. In the event of loss of radioactive material, should security of radioactive material be enhanced?
5. Has your staff been adequately trained on the applicable requirements?
6. Should personnel be re-tested to determine whether re-training should be emphasized for a given area? Is testing adequate to ensure understanding of requirements and procedures?
7. Has your staff been notified of the violation and of the applicable corrective action?
8. Are audits sufficiently detailed and frequently performed? Should the frequency of periodic audits be increased?
9. Is there a need for retaining an independent technical consultant to audit the area of concern or revise your procedures?
10. Are the procedures consistent with current NRC requirements, should they be clarified, or should new procedures be developed?
11. Is a system in place for keeping abreast of new or modified NRC requirements?
12. Does your staff appreciate the need to consider safety in approaching daily assignments?
13. Are resources adequate to perform, and maintain control over, the licensed activities? Has the radiation safety officer been provided sufficient time and resources to perform his or her oversight duties?
14. Have work hours affected the employees' ability to safely perform the job?
15. Should organizational changes be made (e.g., changing the reporting relationship of the radiation safety officer to provide increased independence)?
16. Are management and the radiation safety officer adequately involved in oversight and implementation of the licensed activities? Do supervisors adequately observe new employees and difficult, unique, or new operations?
17. Has management established a work environment that encourages employees to raise safety and compliance concerns?
18. Has management placed a premium on production over compliance and safety? Does

management demonstrate a commitment to compliance and safety?

19. Has management communicated its expectations for safety and compliance?
20. Is there a published discipline policy for safety violations, and are employees aware of it? Is it being followed?

This information notice requires no specific action nor written response. If you have any questions about the information in this notice, please contact one of the technical contacts listed below.

Robert C. Pierson, Director  
Division of Fuel Cycle Safety and Safeguards  
Office of Nuclear Material Safety  
and Safeguards

Donald A. Cool, Director  
Division of Industrial and Medical Nuclear  
Office of Nuclear Material Safety and  
and Safeguards

Technical contacts: (Updated as of November 22, 2005)

Sally Merchant, Office of Enforcement  
(301) 415-2747  
[Internet:slm2@nrc.gov](mailto:slm2@nrc.gov)

Daniel J. Holody, RI  
(610) 337-5312  
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