



Materials Inspection Report

1. Licensee/Location Inspected: ABNA Engineering, Inc. 4140 Lindell Boulevard St. Louis, MO 63108 Report Number(s) 2023001		2. NRC/Regional Office Region III U. S. Nuclear Regulatory Commission 2443 Warrenville Road, Suite 210 Lisle, IL 60532-4352	
3. Docket Number(s) 030-36087	4. License Number(s) 24-32415-01	5. Date(s) of Inspection June 20, 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)

Presented on page 2 and 3 under items A and B.

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	RAYMOND E. BAILEY	7/13/2023
NRC INSPECTOR	Elizabeth Tindle-Engelmann	Elizabeth D. Tindle-Engelmann <small>Digitally signed by Elizabeth D. Tindle-Engelmann Date: 2023.07.12 15:23:19 -0500</small>
BRANCH CHIEF	Rhex Edwards	 <small>Digitally signed by Rhex A. Edwards Date: 2023.07.12 15:45:38 -0500</small>

Materials Inspection Report (Continued)

- A. 10 CFR 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 107, 171-180, and 390-397.

49 CFR 177.817(a) states, in part, that a carrier may not transport a hazardous material unless it is accompanied by a shipping paper prepared in accordance with part 172 of this subchapter. Pursuant to 49 CFR 172.101, radioactive material is classified as hazardous material.

Contrary to the above, on June 20, 2023, the licensee transported 10 millicuries of Cesium-137 and 50 millicuries of Americium-241/Beryllium outside the confines of its facility without a shipping paper prepared in accordance with 49 CFR Part 172. Specifically, the licensee transported a portable gauge to a temporary job site without shipping papers.

As a corrective action, the licensee placed shipping papers with the required information in each portable gauge's envelope which is retrieved by the gauge user prior to transporting the portable gauge. Additionally, as a preventative action, on June 23, 2023, the licensee performed training with all gauge users on the requirement to have shipping papers during transport of the portable gauges.

- B. 10 CFR 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR Parts 107, 171-180, and 390-397.

49 CFR 172.604 requires, in part, that a person who offers a hazardous material for transportation must provide a numeric emergency response telephone number, including the area code, for use in an emergency involving the hazardous material.

Contrary to the above, on June 20, 2023, the licensee transported 10 millicuries of Cesium-137 and 50 millicuries of Americium-241/Beryllium and failed to provide a numeric emergency response telephone number for use in an emergency involving the hazardous material. Specifically, the licensee transported a portable gauge to a temporary job site without a numeric emergency response telephone number available to the transporter.

As a corrective action, the licensee included the numeric emergency response telephone number on the shipping papers for each portable gauge. Additionally, as a preventative action, on June 23, 2023, the licensee performed training with all gauge users on the requirement to have access to shipping papers with a numeric emergency response telephone number.



Materials Inspection Record

1. Licensee Name: ABNA Engineering, Inc.		2. Docket Number(s): 03036087		3. License Number(s) 24-32415-01	
4. Report Number(s): 2023001			5. Date(s) of Inspection: June 20, 2023		
6. Inspector(s): Elizabeth Tindle-Engelmann, Carol Dye		7. Program Code(s): 03121	8. Priority: 5	9. Inspection Guidance Used: 87139	
10. Licensee Contact Name(s): Raymond Bailey		11. Licensee E-mail Address: rbailey@abnacorp.com		12. Licensee Telephone Number(s): 314-454-0222 x1120	

13. Inspection Type: <input type="checkbox"/> Initial		14. Locations Inspected: <input type="checkbox"/> Hybrid		15. Next Inspection Date (MM/DD/YYYY):	
<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> Announced	<input checked="" type="checkbox"/> Main Office	<input type="checkbox"/> Field Office	June 20, 2028	
<input type="checkbox"/> Non-Routine	<input checked="" type="checkbox"/> Unannounced	<input checked="" type="checkbox"/> Temporary Job Site	<input type="checkbox"/> Remote	<input checked="" type="checkbox"/> Normal	<input type="checkbox"/> Extended
				<input type="checkbox"/> Reduced	<input type="checkbox"/> No change

16. Location(s) Inspected List:
Main Office: 4140 Lindell Boulevard, St. Louis MO 63108,
Temporary Job Site (TJS): approximately latitude 38.674368 N, longitude -90.3584893 (90.3584893 W)

17. Scope and Observations:
The licensee was an engineering company with authorization for possession and use of Campbell-Pacific Nuclear Corporation (CPN) Model MC Series portable gauges containing Americium-241 and Cesium-137, and Seaman Nuclear Corporation (Seaman) Model C-200 and C-300 portable gauges containing Radium-226. The licensee possessed four CPN gauges and one Seaman gauge. The Seaman gauge was in long-term storage and was last leak-tested 5-30-2023. The licensee had six gauge users, two of whom possessed separate CPN gauges at different TJSs. The licensee typically used CPN gauges at TJSs a couple of times per week; all gauges were returned to the main office at the end of each day.

The inspectors toured the licensee's facility and reviewed the security of the gauges. The inspectors reviewed records associated with audits, dosimetry, inventory, leak tests, and training. The inspectors visited a gauge user at a TJS and reviewed the security and transportation of the gauge. The gauge user demonstrated adequate knowledge of portable gauge security, and safety. The inspectors identified that shipping papers and emergency contact information were not available in the portable gauge transport truck. Two violations of DOT requirements were identified during the inspection. The violations were of 49 CFR 177.817(a) and 49 CFR 172.604, through 10 CFR 71.5(a). The violations, corrective actions, and preventive actions are described on the associated NRC FORM 591M.

The inspectors performed independent surveys using a RadEye G (SN: 30653; calibration due: 5/9/2024). Results were consistent with the licensee's survey records and postings.

Signature and Date - Branch Chief



Digitally signed by Rhex A. Edwards
Date: 2023.07.12 15:45:17 -05'00'