



Materials Inspection Report

1. Licensee/Location Inspected: Cochran 530A E. Independence Dr. Union, Missouri 63084 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) 030-37025	4. License Number(s) 24-32594-01	5. Date(s) of Inspection Aug. 4, 2022 - Oct. 30, 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)

Contrary to 10 CFR 30.34(i), as of August 4, 2022, the licensee failed to use a minimum of two independent physical controls that form tangible barriers to secure portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee. Specifically, while licensee staff used two chains to secure the gauge case in a vehicle, only one barrier (a locked hasp) was used to secure the gauge case closed. As corrective action, the licensee retrained all staff to use two locks to lock both hasps when securing gauge cases in vehicles.

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	KIRK DOTSON		11/30/23
NRC INSPECTOR	Geoffrey Warren, Sr. HP	Geoffrey M. Warren	<small>Digitally signed by Geoffrey M. Warren Date: 2023.11.15 09:06:17 -0600</small>
BRANCH CHIEF	Rhex Edwards		<small>Digitally signed by Rhex A. Edwards Date: 2023.11.15 08:38:27 -0600</small>



Materials Inspection Record

1. Licensee Name: Cochran		2. Docket Number(s): 030-37025		3. License Number(s) 24-32594-01	
4. Report Number(s): 2022001			5. Date(s) of Inspection: August 4, 2022 through October 30, 2023		
6. Inspector(s): Geoffrey Warren		7. Program Code(s): 04416	8. Priority: 5	9. Inspection Guidance Used: IP 87139	
10. Licensee Contact Name(s): Tom Beuke, RSO Kirk Dotson, Director of Construction Testing		11. Licensee E-mail Address: tbeuke@cochraneng.com kdotson@cochraneng.com		12. Licensee Telephone Number(s): 636-584-0540	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		14. Locations Inspected: <input type="checkbox"/> Hybrid <input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 08/04/2027 <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 - 530A E. Independence Dr, Union MO Field office - 1163 Maple St., Farmington MO					
17. Scope and Observations: This was an unannounced routine inspection. The licensee was a civil engineering firm that provided portable gauge services out of five locations in eastern Missouri. At the main office in Union, the licensee possessed five portable gauges as described on the license for use daily during the construction season for soils engineering projects, including soil compaction and backfill testing. At this site, the licensee employed six authorized gauge users who had completed manufacturers training. At the Farmington site, one authorized gauge user used a single gauge stored at that location. In addition, the licensee possessed three gauges at the Wentzville site, two in Fenton, and one in Ozark. The licensee did not perform any service or maintenance activities on its gauges; these services were performed by an area service provider. The devices were stored chained inside locked cages or cabinets in the licensee's offices. The licensee secured the gauges in accordance with the two barriers rule except as described below. A radiation survey instrument is available in the Union office in case of emergency. Performance Observations: At the time of this inspection, the gauges were not in use. The inspector toured the facilities and observed gauge security in the offices and gauges prepared for transport into the field, including shipping paper placement. Licensee staff demonstrated or described gauge use in the field and emergency procedures. Licensee staff demonstrated an adequate level of understanding of emergency and handling procedures during job-site interviews. Interviews with licensee personnel indicated adequate knowledge of radiation safety concepts and procedures. Review of radiation dosimetry records indicated no exposures of concern. The inspector performed independent and confirmatory radiation measurements using a calibrated survey instrument that were consistent with licensee survey records and postings. Upon arriving at the Union site in August 2022, the inspector observed multiple vehicles with gauges prepared to leave; because of weather conditions the gauges were not sent into the field that day. The inspector observed that the gauges were secured in the vehicles with two cables and locks securing the cases in the vehicles, but only a single hasp locked to prevent removal of the gauges from the cases. This is a violation of 10 CFR 30.34(i), which requires each licensee to use a minimum of two independent physical controls that form tangible barriers to secure					

Materials Inspection Record (Continued)

portable gauges from unauthorized removal, whenever portable gauges are not under the control and constant surveillance of the licensee. The root cause of the violation was a misunderstanding of the requirement. As corrective action, the licensee retrained the staff to use two locked hasps to prevent opening the cases while secured in vehicles. On the visit in October 2023, a licensee demonstration showed that gauges were being secured properly in the vehicle, and licensee staff who demonstrated the setup showed good understanding of security requirements for gauges. Because one level of physical control existed, there was no actual loss of material, and the failure is not repetitive, this is categorized as a Severity Level IV violation.

Signature and Date - Branch Chief



 Digitally signed by Rhex A. Edwards
Date: 2023.11.15 08:35:39 -06'00'