



ENFORCEMENT PROGRAM ANNUAL REPORT

Calendar Year 2024

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**U.S. Nuclear Regulatory Commission
Office of Enforcement
Washington, DC 20555**

Executive Summary

The U.S. Nuclear Regulatory Commission (NRC) continued to effectively carry out the agency's Enforcement Program in calendar year (CY) 2024. NRC regional and headquarters offices maintained their focus on appropriate and consistent enforcement of the agency's regulations.

In CY 2024, the NRC issued 73 escalated enforcement actions under traditional enforcement, the Reactor Oversight Process, and the Construction Reactor Oversight Process. These actions included 14 notices of violation (NOVs) with proposed civil penalties (CPs) totaling \$188,000, as well as 3 confirmatory orders (COs), 1 prohibition order forbidding involvement in NRC-licensed activities, 1 imposition of a CP order, and 54 escalated NOVs without a proposed CP.

The total number of escalated enforcement actions in CY 2024 across all regulatory oversight programs increased from the total number (63) reported in CY 2023. Operating reactors and nuclear materials users continue to account for most escalated enforcement actions.

Operating reactors (including those under construction), fuel cycle facilities, and nuclear materials users accounted for most nonescalated enforcement actions—that is, NOVs and noncited violations associated with green significance determination process findings under the Reactor Oversight Process, and Severity Level (SL) IV NOVs and noncited violations under traditional enforcement. In CY 2024, no significant trends were noted in the number of nonescalated enforcement actions for all categories of licensees listed above.

Noteworthy Program Accomplishments

In CY 2024, the agency launched a new modernized and integrated case work database for the investigations, allegations, and enforcement program. The new database, Allegations, Resolution, Investigation, and Enforcement System (ARIES) is expected to streamline inter-office communications by reducing repetitive data entry, enhancing search capabilities, achieving greater transparency of data sharing across these program areas, and gaining efficiencies by using an integrated platform. Enhancements to the system will continue in CY 2025 to achieve greater system effectiveness and functionality.

On August 23, 2024, the Office of Enforcement revised the Enforcement Policy to incorporate an Interim Enforcement Policy for “Enforcement Discretion for Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material (10 CFR Part 37).” This interim enforcement policy allows staff to continue to exercise enforcement discretion for dispositioning violations associated with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 37, “Physical Protection of Category 1 or Category 2 Quantities of Radioactive Material,” involving large components containing Category 1 or Category 2 quantities of radioactive material, or Category 1 and Category 2 quantities of radioactive material stored in robust structures at power reactor facilities.

Significant Cases

In CY 2024, the NRC processed four significant cases, summarized here and described further in the appendices:

- (1) On June 13, 2024, the NRC issued a CO to Curium US LLC (Curium), memorializing commitments reached during an alternative dispute resolution (ADR) mediation session held on March 5–6, 2024. The ADR session was associated with 10 apparent violations involving

an incident in which a medical isotope shipping cask was released from a hot cell, with a highly contaminated component inside, which resulted in a sitewide contamination event. Curium agreed to complete wide-ranging corrective actions to its programs and procedures. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

- (2) On April 4, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$45,000 to International Isotopes, Inc. (licensee), for an SL III problem. The SL III problem involved the licensee's failure to import special nuclear materials in accordance with NRC requirements for a general license pursuant to 10 CFR Part 110, "Export and Import of Nuclear Equipment and Material," and the failure to receive and transfer special nuclear material in accordance with an authorization in a specific license issued by the NRC pursuant to 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material."
- (3) On May 22, 2024, the NRC issued a CO to Mistras Group, LLC, memorializing commitments reached during an ADR mediation session held on March 21, 2024. The ADR session was associated with an apparent violation involving the willful falsification of certificates of calibration for nondestructive test equipment used at nuclear power plants. As a result of the CO, the NRC will not cite the apparent violation and will not issue an associated CP.
- (4) On August 27, 2024, the NRC issued an NOV to Southern Nuclear Operating Company, Inc. (licensee), for an SL III problem involving two violations at the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2. The violations involved the licensee's failure to (1) maintain records of radiation and contamination surveys that were complete and accurate in all material aspects, as required by 10 CFR 50.9(a), and (2) make or cause to be made surveys of radiologically controlled areas that were reasonable under the circumstances to evaluate radiation levels, concentrations or quantities of residual radioactivity, and the potential hazards associated with radiation levels or residual radioactivity, as required by 10 CFR 20.1501(a)(2). These violations resulted from the falsification of contamination and radiation survey records by a Hatch senior radiation protection technician. These records are necessary to establish adequate protective measures related to radiological conditions and hazards to workers at the plant.

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I. Program Overview

A. Mission and Authority

The U.S. Nuclear Regulatory Commission (NRC) protects public health and safety and advances the nation's common defense and security by enabling the safe and secure use and deployment of civilian nuclear energy technologies and radioactive materials through efficient and reliable licensing, oversight, and regulation for the benefit of society and the environment. The NRC accomplishes its mission through the licensing of nuclear facilities and the possession, use, and disposal of nuclear materials; the development and implementation of requirements governing licensed activities; and inspection and enforcement activities to ensure compliance with these requirements (figure 1).

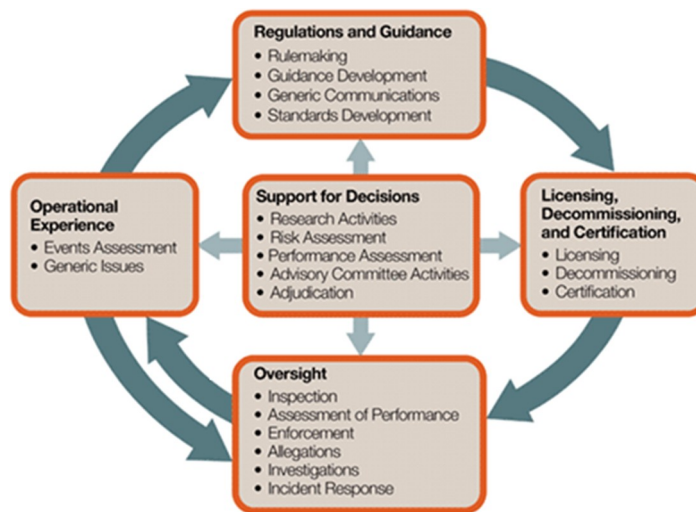


Figure 1 How the NRC regulates

The NRC conducts various types of inspections and investigations designed to ensure that the activities it licenses are conducted in strict compliance with the Commission's regulations, the terms of the licenses, and other requirements.

The sources of the NRC's enforcement authority are the Atomic Energy Act of 1954, as amended; the Energy Reorganization Act of 1974, as amended; and the Energy Policy Act of 2005. These statutes give the NRC broad authority with respect to its Enforcement Program. The Energy Policy Act of 2005 also expanded the definition of byproduct material, placing additional byproduct material under the NRC's jurisdiction, including both naturally occurring and accelerator-produced radioactive materials. The NRC carries out its broad enforcement authority through Title 10 of the *Code of Federal Regulations* (10 CFR) Part 2, "Agency Rules of Practice and Procedure," Subpart B, "Procedure for Imposing Requirements by Order, or for Modification, Suspension, or Revocation of a License, or for Imposing Civil Penalties." Congress also provides the statutory framework for the Federal Government to use alternative dispute resolution (ADR) in conjunction with enforcement authority through the Administrative Dispute Resolution Act of 1996.

The NRC Office of Enforcement (OE) develops policies and programs for the enforcement of NRC requirements. In addition, OE oversees the agency's enforcement activities, giving programmatic

and implementation guidance to NRC regional and headquarters offices that conduct or participate in enforcement activities, to ensure consistent implementation of the NRC's Enforcement Program.

The Enforcement Policy establishes the general principles governing the NRC's Enforcement Program and specifies a process for implementing its enforcement authority in response to violations of agency requirements. This statement of policy is based on the NRC's view that compliance with its requirements plays a critical role in ensuring safety, maintaining security, and protecting the environment. The policy applies to all NRC licensees, to various categories of nonlicensees (vendors and contractors), and to individual employees of licensed and nonlicensed firms involved in NRC-regulated activities.

The NRC enforces compliance as necessary. Enforcement actions serve as a deterrent, emphasize the importance of compliance with regulatory requirements, and encourage the prompt identification and comprehensive correction of violations. In addition, because violations occur in a variety of activities and vary in significance, the policy contains graduated sanctions informed by risk and regulatory significance.

Enforcement authority includes using notices of violation (NOVs); civil penalties (CPs); demands for information; and orders to modify, suspend, or revoke a license. The NRC staff may exercise discretion in determining appropriate enforcement sanctions. Most violations are identified through inspections and investigations. In traditional enforcement, violations are normally assigned severity levels (SLs), which range from SL IV for violations of more than minor concern to SL I for the most significant violations.

The Reactor Oversight Process (ROP) supplements the enforcement process for operating nuclear reactors. The NRC has implemented a similar process to assess findings at new reactor construction sites. Under the ROP, the NRC staff does not normally assign SLs to violations but instead assigns them a "significance" by assessing their associated inspection findings. The NRC determines the risk significance of inspection findings using the significance determination process (SDP), which designates findings as green, white, yellow, or red (in order of increasing risk significance). Findings under the ROP may also include licensee failures to meet self-imposed standards; such findings may or may not involve violations of regulatory requirements. Violations and findings assessed as white, yellow, or red are considered escalated enforcement actions.

Although the ROP applies to most violations, some aspects of violations (e.g., willfulness and individual actions) cannot be addressed solely through the SDP; such violations require the NRC to follow the traditional enforcement process. The NRC uses traditional enforcement for violations that have actual safety or security consequences, affect the agency's ability to perform its regulatory oversight function, or involve willfulness.

In addition, although ROP findings are not normally subject to CPs, the NRC does consider CPs for any violations that have actual consequences. SL IV violations and violations associated with green ROP findings are normally dispositioned as noncited violations (NCVs) if certain criteria are met. Inspection reports or records document NCVs and briefly describe the corrective actions that the licensee has taken or plans to take, if these actions are known at the time the NCV is documented. Additional information about the ROP is available at <https://www.nrc.gov/reactors/operating/oversight.html>.

The NRC's enforcement website, available at <http://www.nrc.gov/about-nrc/regulatory/enforcement.html>, presents a variety of information, including the Enforcement Policy and the Enforcement Manual. It also contains information on escalated enforcement actions that the NRC has issued to reactors and materials licensees, nonlicensees, and individuals. In keeping with agency practices and policies, the NRC's public website does not provide details on most security-related actions and activities.

B. Escalated Enforcement Actions

Escalated enforcement actions include the following:

- NOVs, including SL I, II, or III violations
- NOVs associated with a problem (closely related violations may be grouped together as a problem to appropriately characterize the significance of the event or incident)
- SL IV violations to individuals
- NOVs associated with red, yellow, or white SDP findings
- CP actions
- enforcement orders (including confirmatory orders (COs) that result from the ADR process) and orders to suspend, revoke, or modify an NRC license

During calendar year (CY) 2024, the NRC issued 73 escalated enforcement actions to licensees, nonlicensees, and individuals. Figure 2 shows the distribution of these actions by category.

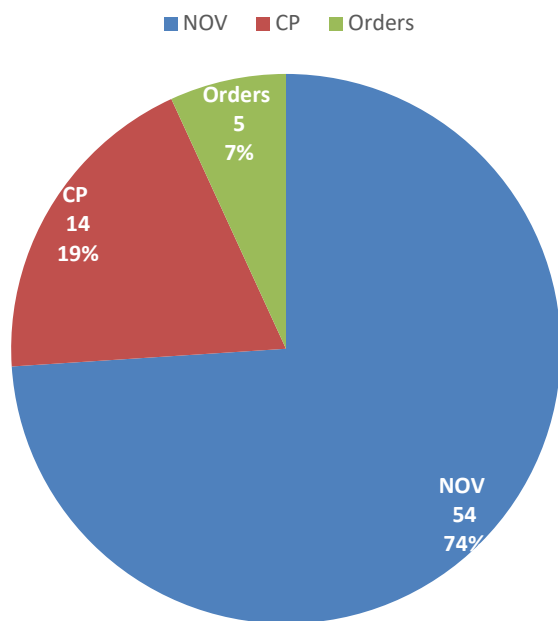


Figure 2 Escalated enforcement by type of action (CY 2024)

As shown in figure 2, of the 73 escalated enforcement actions issued in CY 2024, 54 (or approximately 74 percent) were NOVs without CPs. In general, the NRC considers a large percentage of NOVs without CPs to be a positive outcome because it demonstrates that most licensees identify and correct violations themselves—a goal of the Enforcement Program.

NOVs with CPs comprised approximately 19 percent of the escalated enforcement actions. These included 14 NOVs with associated CPs.

Figure 3 shows the distribution of escalated enforcement actions issued in CY 2024 by business line. The number of escalated enforcement actions for each business line may also include actions issued to individuals.

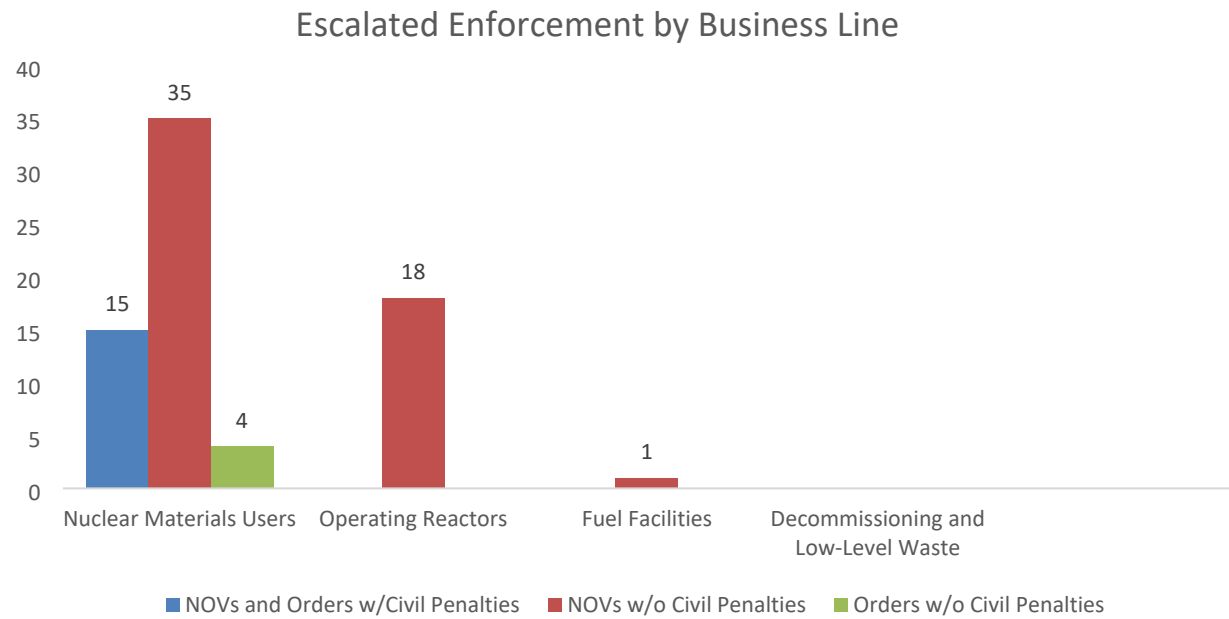


Figure 3 Escalated enforcement by business line (CY 2024)

As shown in figure 3, nuclear materials users received the highest number of escalated enforcement actions in CY 2024 (a total of 54), accounting for 74 percent of all actions issued. This was followed by operating reactors, which received 18 actions (or 25 percent of all actions). Fuel facilities and decommissioning and low-level waste accounted for one escalated enforcement action in CY 2024 (or 1 percent of all actions).

Table 1 breaks down the escalated enforcement actions issued in CY 2024 by region and program office. Historically, Region II has had the fewest escalated enforcement actions because it does not process nuclear materials user cases, which usually make up the highest percentage of escalated enforcement actions (74 percent in CY 2024). In CY 2024, Region II issued a total of six enforcement actions, five to operating reactors and one to a fuel facility. The data in table 1 have not been normalized for either type or number of licensees in each region.

Table 1 Escalated Enforcement Actions by Region and Program Office (CY 2024)

Office/Region	NOVs and Orders w/ Civil Penalties	NOVs w/o Civil Penalties	Orders w/o Civil Penalties	Total
REGION IV	5	19	0	24
REGION III	6	19	1	26
REGION II	0	6	0	6
REGION I	4	9	1	14
NMSS	0	0	1	1
NRR	0	0	1	1
OIP	0	1	0	1
Total	15	54	4	73

Key to Program Offices

NMSS—Office of Nuclear Material Safety and Safeguards

NRR—Office of Nuclear Reactor Regulation

OIP—Office of International Programs

1. Escalated Enforcement Trends

As previously noted, the NRC issued 73 escalated enforcement actions in CY 2024. This was higher than the number issued in CY 2023 (63) and slightly higher than the annual average over the past 5 years (66).

Figure 4 shows escalated enforcement trends from CY 2014 through CY 2024 by business line. As shown in the figure, the number of enforcement actions for nuclear materials users remained generally consistent from CY 2018 until CY 2022, when it rose significantly. In CY 2024, the number of enforcement actions for nuclear materials users (53) rose and is higher than the 5-year average (42). However, in CY 2024, the number of enforcement actions for operating reactors (19) stayed consistent with CY 2023, and it remained in line with the 5-year average (23) of enforcement actions.

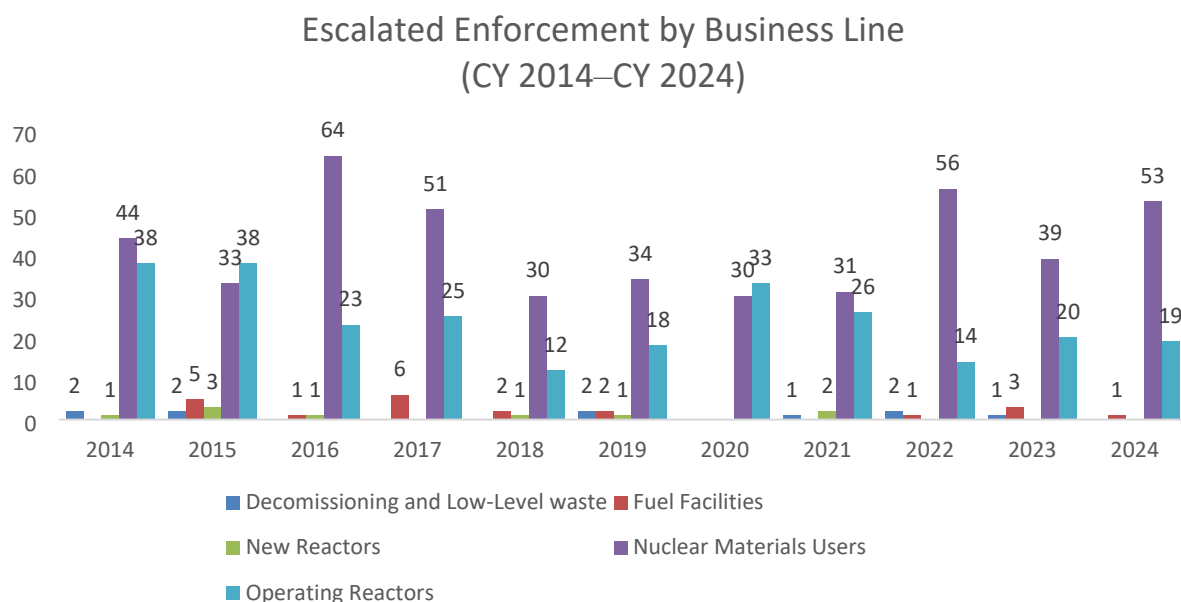


Figure 4 Escalated enforcement by business line (CY 2014–CY 2024)

2. Civil Penalty Actions

The levying of a CP is a significant action, and it most often reflects issues of a repetitive nature, the inability of a licensee to identify and correct issues, or instances involving elements of willfulness. In CY 2024, the NRC processed 14 enforcement actions totaling \$188,000 in proposed CPs. All these 14 enforcement actions were associated with nuclear materials users.

Of the 14 CP cases, one involved “willfulness,” which is defined as either deliberate misconduct or careless disregard. The Commission is particularly concerned with the identification of willful violations. The NRC’s regulatory program relies on licensees and their contractors, employees, and agents to act with integrity and communicate with candor; therefore, the NRC may consider a violation involving willfulness to be more egregious than the underlying violation taken alone, and the NRC may increase the SL accordingly.

The total proposed CP amount issued in CY 2024 was lower than the amount issued in CY 2023 and substantially lower than the 5-year average. This higher 5-year average was partly because, in CY 2020 through CY 2021, a significant number of proposed CPs were issued to operating reactors whose base CP amounts are substantially higher than for other licensee types. In CY 2024, there were no CPs issued at operating reactors.

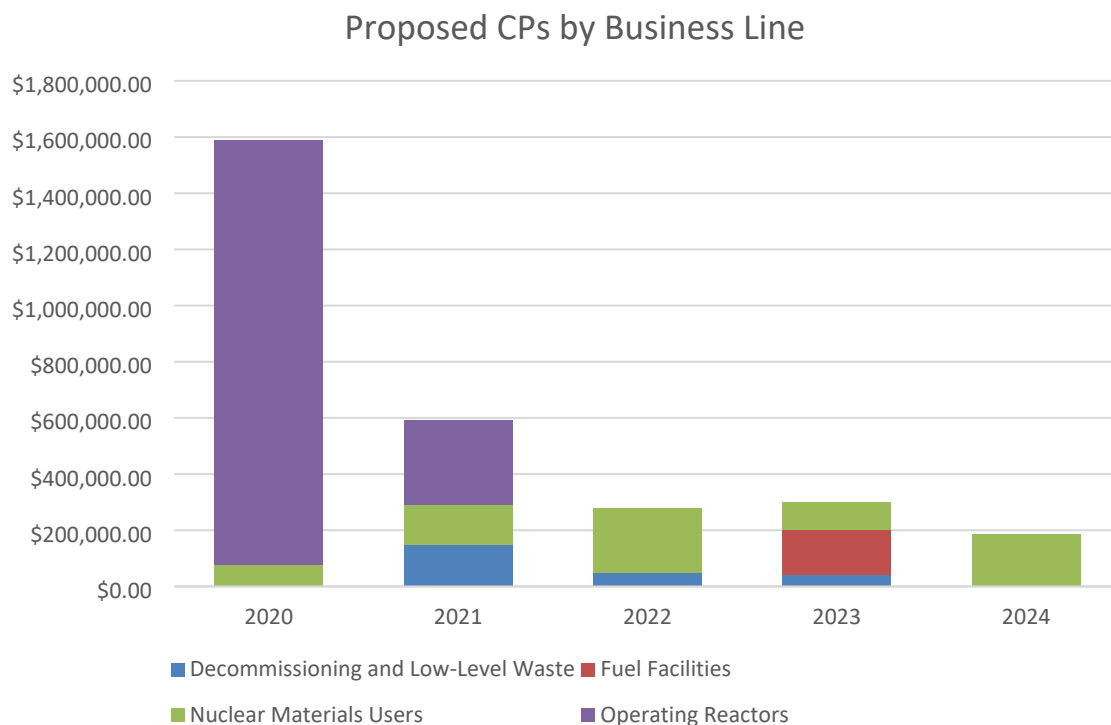


Figure 5 Proposed CPs by business line (CY 2020–CY 2024)

Figure 5 shows the total dollar amount of proposed CPs from CY 2020 through CY 2024 by business line. Appendix A to this report briefly describes each of the enforcement actions for which the NRC assessed a CP in CY 2024. Although appendix A does not describe NOVs with CPs that involved security-related issues, the data in this report do include such NOVs.

3. Notices of Violation without Civil Penalties

In accordance with Section 2.3.4, “Civil Penalty,” of the Enforcement Policy, a CP may not be warranted for escalated enforcement actions evaluated under traditional enforcement if either of the following criteria are met:

- The identified violation was the first nonwillful SL III violation identified during the past 2 years or during the last two inspections (whichever period is longer) at the licensee’s facility, and the licensee took adequate corrective action to prevent its recurrence.
- The identified violation was not the first nonwillful SL III violation identified during the past 2 years or during the last two inspections, but the licensee identified the violation and took adequate corrective action to prevent its recurrence.

Violations assessed under the ROP SDP are normally not considered for CPs unless they have had actual consequences. In addition, when appropriate, the NRC may use enforcement discretion to refrain from proposing a CP, regardless of the normal CP assessment process described above.

In CY 2024, the NRC issued a total of 54 escalated NOVs without CPs (compared to 48 in CY 2023), 7 to operating reactor licensees, 33 to nuclear materials user licensees, 1 to a fuel facility

licensee, and 13 to individuals (licensed or nonlicensed). Of the seven NOV's issued to operating reactor licensees, four were associated with white SDP findings under the ROP, and three were SL III violations. For the 12th consecutive year, the NRC issued no red SDP findings with or without associated violations.

4. Enforcement Program Timeliness

The NRC issues escalated enforcement actions in cases involving violations assessed at SL I, II, or III (and SL IV for individuals) dispositioned under the traditional enforcement process; violations associated with white, yellow, or red findings issued to reactor licensees participating in the ROP; and orders that impose sanctions.

The timeliness of escalated enforcement actions associated with investigations (cases involving potential willfulness or discrimination) at operating reactor and materials user licensees is an output measure (external goal) reported annually to Congress as part of the NRC's Congressional Budget Justification (NUREG-1100). To stress the importance of issuing timely escalated enforcement actions, the agency has set two performance goals: (1) 100 percent of cases not based on investigations by the Office of Investigations (OI) are to be completed within an NRC processing time not to exceed 160 days (internal performance indicator), and (2) 100 percent of OI-related cases are to be completed within an NRC processing time not to exceed 330 days (Congressional Budget Justification performance indicator).

The NRC processing time starts on the latest of (1) the inspection exit date for non-OI-related cases, (2) the date of the memorandum forwarding the OI report to the staff for OI-related cases, (3) the date the NRC is informed that the U.S. Department of Justice declined to initiate a potential criminal prosecution, and (4) the date of the U.S. Department of Labor decision that is the basis for the action. For purposes of timeliness reporting, the NRC may group multiple related escalated enforcement actions and treat them as a single case. For example, the NRC may disposition a violation and take escalated enforcement action against a licensee and one or more individuals. Although multiple enforcement actions may be involved, the NRC will treat these separate actions as one case in its timeliness reporting, to avoid biasing timeliness data either positively or negatively.

In CY 2024, the NRC staff processed all 51 non-OI-related enforcement cases within 160 processing days and all 10 OI-related enforcement cases within 330 processing days (these numbers (51 and 10) are associated with enforcement cases, not enforcement actions). A streamlined process implemented in CY 2016 (modified enforcement panel process) contributed significantly to the staff's ability to meet its timeliness goals. This modified panel process is used for traditional enforcement cases and enhances efficiency in processing enforcement cases that do not require additional interactions, clarifications, or extended panel deliberations. OE will continue to leverage the modified panel process and to work closely with the regional and program office staffs towards early identification of enforcement cases that are likely to involve complex technical or legal issues or other case-specific challenges, to manage issues that may lead to additional processing time.

Figure 6 shows that, on average, the NRC took 101 processing days for non-OI-related enforcement case work, which is well below the agency goal of 160 processing days. In CY 2020, OE developed and implemented a new communication strategy that involves early engagement by senior management when it appears that an enforcement case may exceed the congressional metric. This new process continued to help the staff meet its timeliness goals for CY 2024.

Non-OI-Related Case Timeliness (CY 2020–CY 2024)

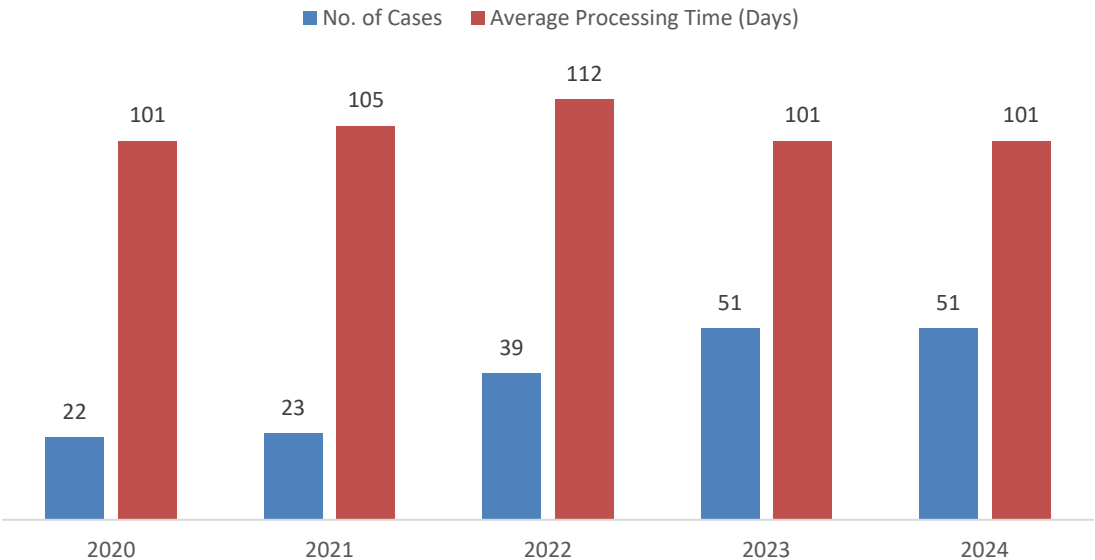
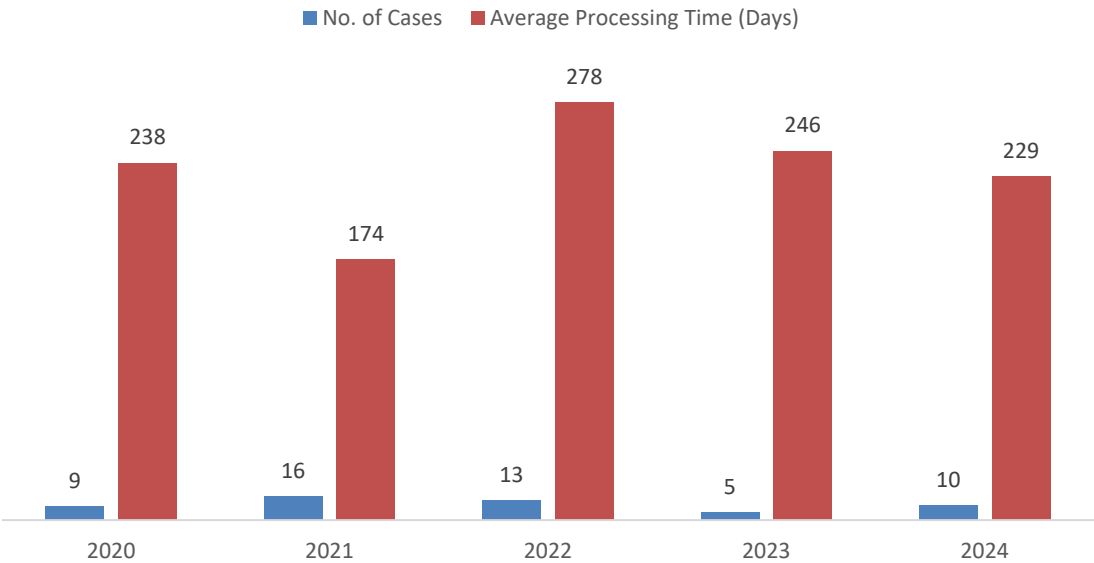


Figure 6 Non-OI-related case timeliness (CY 2020–CY 2024)

Figure 7 shows the trend in case processing times for OI-related escalated enforcement actions over the past 5 CYs. In CY 2024, on average, it took the NRC 229 days to issue an OI-related enforcement action. This is within the congressional goal of 330 processing days and is slightly lower than the 5-year average. The shortest and longest processing times for OI-related cases in CY 2024 were 147 days and 296 days, respectively.

OI-Related Case Timeliness (CY 2020–CY 2024)



Note: The numbers of non-OI-related (51) and OI-related (10) escalated enforcement cases do not add up to the total number of escalated enforcement actions (73) because some cases involved the issuance of multiple enforcement actions to licensees and individuals.

Figure 7 OI-related case timeliness (CY 2020–CY 2024)

5. Alternative Dispute Resolution

Alternative dispute resolution (ADR) refers to a variety of voluntary processes, such as mediation and facilitated dialogue, to assist parties in resolving disputes and potential conflicts outside of the courts. The NRC’s enforcement ADR program employs mediation by a neutral third party with no decision-making authority. Participation in the process is voluntary, and the content of the final mutual agreement is normally formalized in a CO.

The term “enforcement ADR” refers to the use of mediation (1) after OI has completed its investigation and an enforcement panel has concluded that pursuit of an enforcement action appears to be warranted, and (2) in escalated nonwillful, traditional enforcement cases with the potential for CPs.

Under OE’s enforcement ADR process, the NRC may offer mediation at any of three points in the enforcement process: (1) before a predecisional enforcement conference, (2) after the initial enforcement action (typically the issuance of an NOV and proposed imposition of a CP), or (3) upon the imposition of a CP and before a hearing request. ADR typically allows the NRC to institute broader or more comprehensive corrective actions than those typically achieved through the normal enforcement process (i.e., restoring compliance).

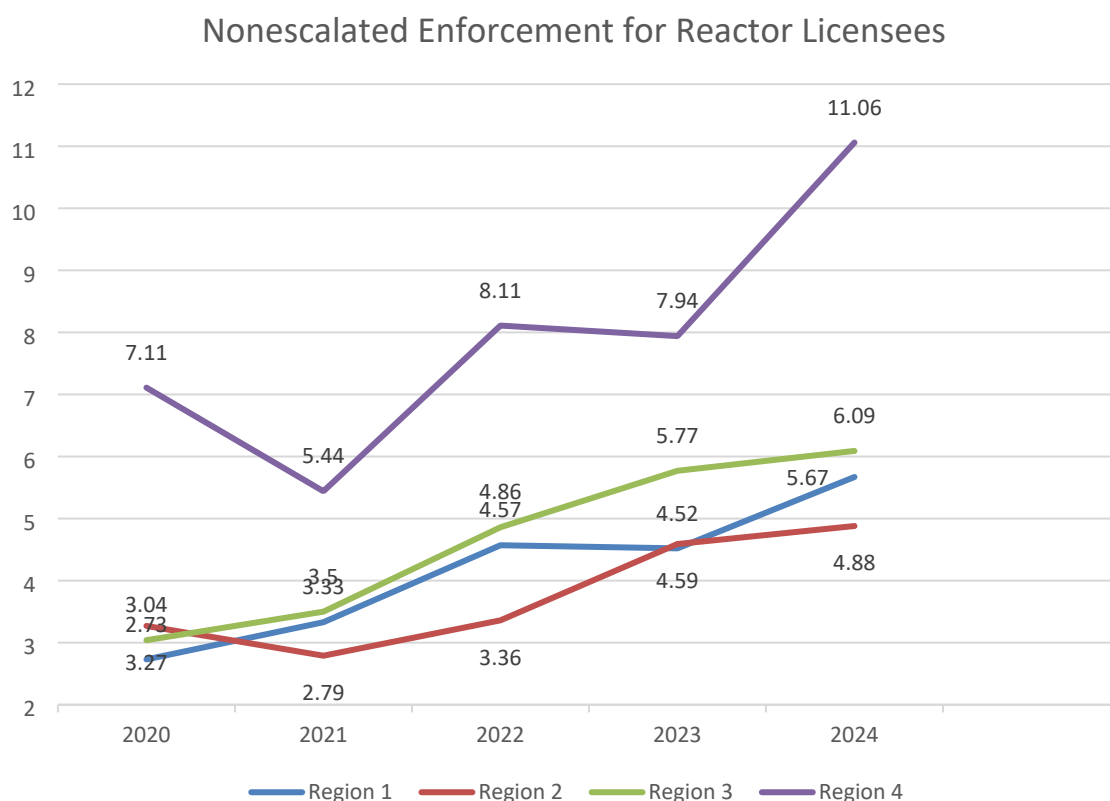
In CY 2024, the NRC participated in three ADR mediation sessions that resulted in orders confirming the terms of the parties’ agreement.

ADR program guidance and specific ADR data can be found at the following link:
<https://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

C. Nonescalated Enforcement

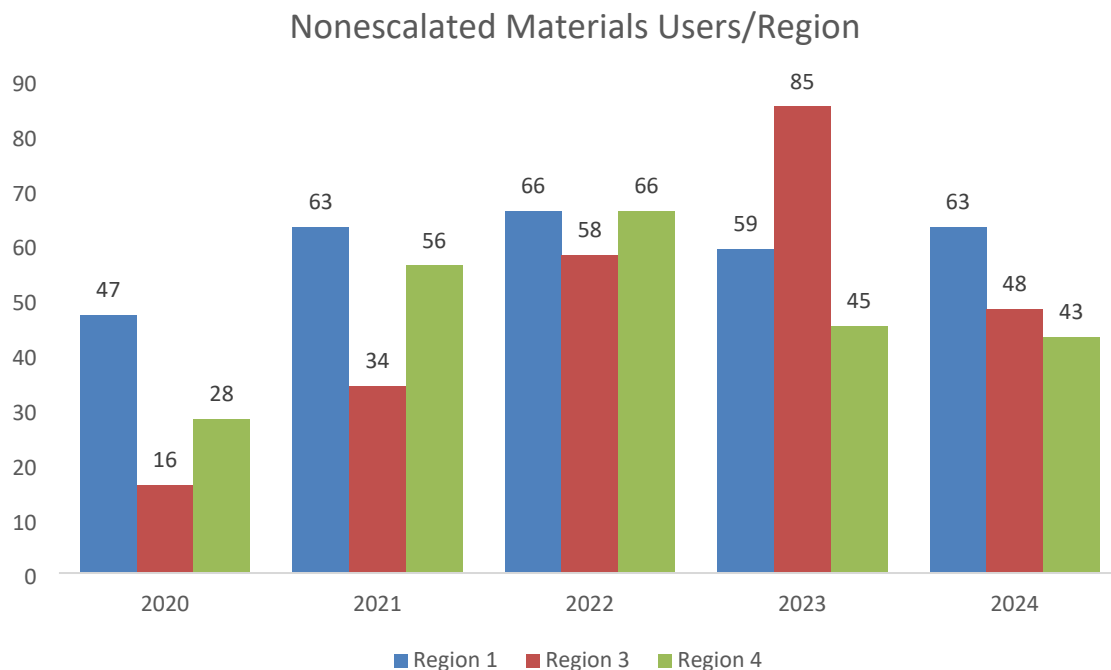
Nonescalated enforcement actions include SL IV NOVs and NCVs under traditional enforcement and NOVs and NCVs associated with green SDP findings under the ROP. The Reactor Program System captures enforcement-related information for operating reactors, and the Web-Based Licensing System records nonescalated actions for nuclear materials users.

Figure 8 shows the trend in the number of nonescalated enforcement actions at reactor licensees for each region over the past 5 years. This information, obtained from the Reactor Program System, was normalized to show the average number of nonescalated actions per operating reactor in each region. Figure 8 shows that, from CY 2020 through CY 2024, this number has steadily become more consistent across three regions; in particular, Regions I, II, and III are all averaging around five nonescalated actions; however, the average for Region IV remains higher. In CY 2022 through CY 2024, on average, the number of nonescalated enforcement actions per operating reactor rose across the four regions likely due to the resumption of pre-pandemic levels of in-person presence at licensee facilities and restoration of inspection sample size requirements.



Note: This figure reflects information available from the Reactor Program System as of February 6, 2025.

Figure 8 Nonescalated enforcement actions per operating reactor, by region (CY 2020–CY 2024)



Note: This figure reflects information available from the Web-Based Licensing System as of February 6, 2025.

Figure 9 Nonescalated enforcement actions for nuclear materials users (CY 2020–CY 2024)

Figure 9 shows the trend in the number of nonescalated enforcement actions for nuclear materials users for each region over the past 5 years. As noted in previous annual reports, the number of SL IV NOV and NCV issued to nuclear materials users has tended to remain steady, except for a noticeable decline in CY 2020. This decline in CY 2020 may be attributed to the NRC’s response to Coronavirus Disease 2019 (COVID-19) pandemic, which included reducing the in-person presence at licensee facilities and allowing inspection requirements to be implemented with minimum samples. Resumption of pre-pandemic levels of in-person presence and inspection sample sizes may be contributing factors for the average of inspection findings seen in CY 2022 and CY 2023.

II. Enforcement Case Work

A. Significant Enforcement Actions

In calendar year (CY) 2024, the U.S. Nuclear Regulatory Commission (NRC) processed several noteworthy enforcement actions, as summarized below. A complete description can be found on the Issued Significant Enforcement Actions website at <https://www.nrc.gov/about-nrc/regulatory/enforcement/current.html>.

Curium US LLC

On June 13, 2024, the NRC issued a confirmatory order (CO) to Curium US LLC (Curium), memorializing commitments reached during an alternative dispute resolution (ADR) mediation session held March 5–6, 2024. The ADR session was associated with 10 apparent violations involving an incident in which a medical isotope shipping cask was released from a hot cell with a highly contaminated component inside, which resulted in a sitewide contamination event. Curium agreed to complete wide-ranging corrective actions to its programs and procedures. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated civil penalty (CP).

International Isotopes, Inc.

On April 4, 2024, the NRC issued a notice of violation (NOV) and proposed imposition of a CP in the amount of \$45,000 to International Isotopes, Inc. (licensee), for a severity level (SL) III problem. The SL III problem involved the licensee's failure to import special nuclear materials in accordance with NRC requirements for a general license pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 110, "Export and Import of Nuclear Equipment and Material," and the failure to receive and transfer special nuclear material in accordance with an authorization in a specific license issued by the NRC pursuant to 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material."

Mistras Group, LLC

On May 22, 2024, the NRC issued a CO to Mistras Group, LLC, memorializing commitments reached during an ADR mediation session held on March 21, 2024. The ADR session was associated with an apparent violation involving the willful falsification of certificates of calibration for nondestructive test equipment used at nuclear power plants. As a result of the CO, the NRC will not cite the apparent violation and will not issue an associated CP.

Southern Nuclear Operating Company, Inc.

On August 27, 2024, the NRC issued an NOV to Southern Nuclear Operating Company, Inc. (licensee), for an SL III problem involving two violations at the Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2. The violations involved the licensee's failure to (1) maintain records of radiation and contamination surveys that were complete and accurate in all material aspects, as required by 10 CFR 50.9(a), and (2) make or cause to be made surveys of radiologically controlled areas that were reasonable under the circumstances to evaluate radiation levels, concentrations or quantities of residual radioactivity, and the potential hazards associated with radiation levels or residual radioactivity, as required by 10 CFR 20.1501(a)(2). These violations resulted from the falsification of contamination and radiation survey records by a Hatch senior radiation protection technician. These

records are necessary to establish adequate protective measures related to radiological conditions and hazards to workers at the plant.

B. Hearing Activities

No hearing activities resulted from enforcement actions in CY 2024.

C. Enforcement Orders

In CY 2024, the NRC issued five orders to licensees, nonlicensees, and individuals. The five orders included three COs that were issued to confirm commitments associated with ADR settlement agreements, one order imposing a CP on a licensee, and one prohibition order banning involvement in NRC-licensed activities. Appendix C to this document briefly describes the enforcement orders issued by the NRC in CY 2024.

D. Enforcement Actions Supported by the Office of Investigations

In CY 2024, the Office of Investigations investigated 9 cases that were substantiated for willfulness (enforcement actions may not have been taken on some of these cases) and 41 cases that were unsubstantiated. Additionally, the Office of Investigation conducted 32 assists-to-staff activities in CY 2024. This assistance provides the NRC staff with clarifying information about concerns to better inform decision-making, allowing the agency to take the most appropriate action.

E. Actions Involving Individuals and Nonlicensee Organizations

In CY 2024, the NRC issued 14 escalated enforcement actions to individuals (5 SL III NOVs, 8 SL IVs, and 1 prohibition order banning involvement in NRC-licensed activities). Appendix D to this document summarizes the enforcement actions issued by the NRC to individuals in CY 2024.

F. Enforcement Actions Involving Discrimination

In CY 2024, no escalated enforcement actions resulted from a substantiated allegation of discrimination.

G. Use of Judgment and Discretion in Determining Appropriate Enforcement Sanctions

Within its statutory authority, the NRC may choose to exercise discretion and either escalate or mitigate enforcement sanctions or otherwise refrain from taking enforcement action. This exercise of discretion allows the NRC to determine actions that are appropriate for a particular case, consistent with the policy. After considering the general tenets of the policy and the safety and security significance of a violation and its circumstances, the NRC may exercise judgment and discretion in determining the SL of the violation and the appropriate enforcement sanction.

In CY 2024, the NRC exercised discretion in 13 enforcement cases, compared to 27 enforcement cases in CY 2023, to address violations of agency requirements. Appendix F to this document briefly describes the cases in which the NRC exercised enforcement discretion in CY 2024.

H. Withdrawn Actions

In CY 2024, licensees disputed five violations issued by the NRC, four green noncited violations and one SL IV NOV. Licensees can challenge enforcement actions for several reasons; for example, a licensee might dispute the requirements, the facts of the case, the NRC's application of the policy, or the significance of the violation. Licensees may also provide clarifying information that was not available at the time of the inspection. For any of these reasons, the NRC may have to revisit enforcement actions and, in some instances, recategorize or withdraw them.

The Office of Enforcement has established a metric for the quality of enforcement actions based on the total number of disputed violations received for consideration and the percentage of enforcement actions withdrawn in a fiscal year; however, this report covers CY 2024 rather than a fiscal year. The target is for no more than 50 percent of disputed enforcement actions to be withdrawn in any fiscal year. This metric does not include violations withdrawn because of supplemental information that was not available to NRC inspectors or staff before the assessment of an enforcement action.

The NRC did not withdraw any violation in CY 2024.

III. Ongoing Activities

A. Enforcement Policy and Guidance

1. Enforcement Policy Revisions

On January 12, 2024, the Office of Enforcement (OE) revised the U.S. Nuclear Regulatory Commission (NRC) Enforcement Policy (EP) to incorporate the adjusted civil monetary penalties for 2024, in accordance with the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015. Additionally, on August 23, 2024, OE revised the EP to incorporate the Interim Enforcement Policy for “Enforcement Discretion for Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material (10 CFR Part 37).”

2. Enforcement Manual Guidance

The staff periodically revises the Enforcement Manual (EM) to reflect changes to the policy, operating experience, and stakeholder input. In calendar year (CY) 2024, the staff revised the EM three times to (1) withdraw an expired enforcement guidance memorandum (EGM), (2) revise an existing EGM, and (3) revise several sections of the EM to reflect current enforcement practices and to clarify guidance where needed. The EM changes are found at the following link: <https://www.nrc.gov/reading-rm/basic-ref/enf-man/cnindex.html>.

Enforcement Guidance Memoranda

OE issues EGM to provide temporary guidance on the interpretation of specific provisions of the policy. The full text of all publicly available EGM (appendix A to the EM) is available on the NRC’s public website at <https://www.nrc.gov/reading-rm/basic-ref/enf-man/app-a.html>. OE revised one EGM in CY 2024. On June 24, 2024, the staff issued EGM-20-001, Revision 4, “Enforcement Discretion Not to Cite Certain Violations of 10 CFR 73.56 Requirements” (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24166A021).

B. Enforcement Program Initiatives

In CY 2024, OE engaged in several activities designed to enhance and continuously improve the NRC’s Enforcement Program. Typical activities include development and improvement of internal office procedures, enhanced staff knowledge and training, mentoring of new staff members by more experienced staff, and leading annual counterpart meetings.

1. Program Enhancements

Throughout the year, the staff worked on several initiatives to keep the Enforcement Program effective and efficient, including the following:

- The agency launched a new modernized and integrated case work database for the investigations, allegations, and enforcement program. The new database, Allegations, Resolution, Investigation, and Enforcement System (ARIES) is expected to streamline inter-office communications by reducing repetitive data entry, enhancing search capabilities, achieving greater transparency of data sharing across these program areas, and gaining

efficiencies by using an integrated platform. Enhancements to the system will continue in CY 2025 to achieve greater system effectiveness and functionality.

- The enforcement dashboards have been developed, and the staff routinely uses them to gather real-time enforcement data. These dashboards help streamline the search, analysis, and comparison of enforcement data to be more efficient and effective. In CY 2024, OE continues to perform routine maintenance on the system and updates the dashboards accordingly. Although ARIES is operational, these dashboards are still needed to gather any historical data to supplement current ARIES capabilities.
- The staff conducted internal audits of OE databases (i.e., Enforcement Action Tracking, Individual Action Tracking) to ensure the integrity of the data and to extract the appropriate figures, statistics, and information for the OE annual report and other OE reporting requirements (e.g., the semiannual report to Congress).
- OE, Office of Investigations (OI), Office of the General Counsel (OGC), and the regional offices worked together to strengthen the partnerships needed to support the investigative process. Feedback from senior leaders and investigation/inspection practitioners in the field indicated that the enhanced communications, focused outreach, and increased process transparency are contributing to program effectiveness.

2. Knowledge Management

Activities associated with training and knowledge transfer in CY 2024 include the following:

- OE continued developing and posting a series of short, focused videos in Microsoft Teams to provide detailed training and refresher training for enforcement specialists and other staff and managers who become involved with the enforcement process. These videos are intended for internal staff use to raise the overall knowledge level and proficiency of program personnel. The series are structured to serve as either overall training, if the videos are used in sequence, or just-in-time training, if individual videos are selected.
- OE further developed and enhanced internal office procedures, internal Enforcement Program SharePoint sites, and Microsoft Teams pages to ensure the consistency of Enforcement Program implementation and the functionality of OE web-based programs.
- OE supported several opportunities for rotational assignments to other offices for the personal growth and development of OE enforcement specialists.
- OE conducted an Enforcement Program counterpart meeting November 18–21, 2024, to discuss ways to improve the Enforcement Program and to enhance communications among the enforcement staff. Representatives from the OGC, OI, regions, and program offices also participated. Topics included Enforcement Manual revisions, Lost Source Policy, the new ARIES database system, and knowledge management topics, to name a few. The meeting resulted in several action items to explore ways to improve the program.
- OE also developed an ARIES guidance document to assist staff when working in the new system. OE also provided several hours of online training and continued to answer staff questions about the operation of the system.

C. Regional Accomplishments

In CY 2024, the regional offices periodically reviewed enforcement actions issued by each region to ensure effective performance and to identify opportunities for continuous improvement. The reviews encompassed reactor and materials cases involving both nonescalated and escalated enforcement actions; they included activities that required a high degree of coordination with other NRC stakeholders.

D. Calendar Year 2025 Focus Areas

During CY 2025, OE plans to address the following focus areas:

- Pending Commission approval through staff requirements memoranda, OE will update the EP with the changes described in SECY-24-0009, “Proposed Revisions to the U.S. Nuclear Regulatory Commission Enforcement Policy,” dated January 25, 2024, Agencywide Documents Access and Management System (ADAMS) Accession No. ML22318A123), and the Interim Enforcement Policy (IEP) revision.
- OE will continue to work on developing and issuing an IEP titled “Enforcement Discretion for General Licensee Adoption of Certificate of Compliance Holder-Generated Changes.” This proposed IEP would allow enforcement discretion for certain general licensee violations related to their adoption of a change generated by the certificate of compliance holder. On April 7, 2025, a *Federal Register Notice* ([90 FR 14917](#)) was issued requesting public comments on proposed changes.
- OE will coordinate with the cognizant Offices (Nuclear Materials Safety and Safeguards, Regions, OGC) to update Section 6.12, “Materials Security,” of the EP to incorporate severity level examples specific to violations of Title 10 of the *Code of Federal Regulations* Part 37, “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material,” for Commission approval, as recommended by the Office of the Inspector General’s report OIG-24-A-06, “Audit of the U.S. Nuclear Regulatory Commission’s Security Oversight of Category 1 and Category 2 Quantities of Radioactive Material,” dated March 25, 2024 (ADAMS Accession No. ML24085A694).
- Conduct an Enforcement Program counterpart meeting focused on team building, program enhancement, collaboration, and knowledge management.
- As part of agency activities to support the Accelerating Deployment of Versatile, Advanced Nuclear for Clean Energy Act of 2024, OE will continue to evaluate the enforcement process to identify efficiencies and implement opportunities to streamline the decision-making process for certain escalated enforcement actions under the traditional enforcement process, with specific focus on providing Regions broader decision authority.
- Continue knowledge management activities, such as video development, and revision of internal office procedures to improve the consistency of Enforcement Program implementation and decision-making. Also, enhance the enforcement specialist qualification program in both content and formality to support a broader base-level knowledge for new enforcement specialists.
- Complete the review of current enforcement boilerplates to ensure that they comply with revised guidance found in NUREG-1379, “NRC Editorial Style Guide,” Revision 4, issued

April 2025 (ADAMS Accession No. ML25098A236), and consolidate boilerplates where applicable.

- OE will continue to partner with the Office of the Chief Information Officer and OI to revise, modify, troubleshoot and enhance the ARIES platform, including focusing on integrating workflow capability to support project management of cases.

Appendix A—Summary of Cases Involving Civil Penalties¹

Civil Penalties Issued to Operating Reactor Licensees

None.

Civil Penalties Issued to Decommissioning Reactor Licensees

None.

Civil Penalties Issued to Materials Licensees

[Alliance HealthCare Services, Inc. \(EA-24-019\)](#)

Irvine, California

On August 27, 2024, the U.S. Nuclear Regulatory Commission (NRC) issued a notice of violation (NOV) and proposed imposition of a civil penalty (CP) in the amount of \$9,000 to Alliance HealthCare Services, Inc., for a Severity Level (SL) III violation of Title 10 of the *Code of Federal Regulations* (10 CFR) 20.1801, “Security of stored material.”

[Yale-New Haven Hospital \(EA-24-022\)](#)

New Haven, Connecticut

On July 24, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to Yale-New Haven Hospital for an SL III problem associated with violations of 10 CFR 20.2001, “General requirements,” and 10 CFR 35.92, “Decay in storage.”

[Defense Health Agency \(EA-23-090, EA-23-149\)](#)

Falls Church, Virginia

On July 1, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to the Defense Health Agency for an SL III violation of 10 CFR 20.1801.

[Prein & Newhof \(EA-23-119\)](#)

Grand Rapids, Michigan

On June 6, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to Prein & Newhof for an SL III violation of 10 CFR 30.34(i).

[CMSC, LLC, dba Great Falls Clinic Hospital \(EA-23-124\)](#)

Great Falls, Montana

On May 16, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to CMSC, LLC, dba Great Falls Clinic Hospital, for an SL III problem associated with 10 CFR 35.40, “Written directives,” and 10 CFR 35.41(a)(2).

¹ The public appendices do not include cases involving security-related issues.

[International Isotopes, Inc. \(EA-23-120\)](#)

Idaho Falls, Idaho

On April 4, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$45,000 to International Isotopes, Inc., for an SL III problem associated with 10 CFR Part 110, "Export and Import of Nuclear Equipment and Material," and 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material."

[Community Health Network, Inc. \(EA-23-108\)](#)

Indianapolis, Indiana

On March 27, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$27,000 to Community Health Network, Inc., for three SL III violations of 10 CFR 20.1802, "Control of material not in storage," 10 CFR 35.40(a), 10 CFR 20.1502(a)(1), and 10 CFR 20.1201(c).

[Phoenix Federal No. 2 Mining, LLC \(EA-23-068\)](#)

Princeton, West Virginia

On March 14, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to Phoenix Federal No. 2 Mining, LLC, for an SL III violation of 10 CFR 30.3, "Activities requiring license."

[International Isotopes, Inc. \(EA-23-070\)](#)

Idaho Falls, Idaho

On January 25, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$18,000 to International Isotopes, Inc., for an SL III violation of 10 CFR 32.210(f) and License Condition 9.D of NRC License No. 11-27680-01MD.

[Geotechnical and Materials Engineers, Inc. \(EA-23-123\)](#)

Fort Wayne, Indiana

On January 18, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$9,000 to Geotechnical and Materials Engineers, Inc., for an SL III violation of 10 CFR 20.1802 and 10 CFR 30.34(i).

[Radiation Solutions, LLC \(EA-22-041, EA-23-032, EA-23-106\)](#)

Sugar City, Idaho

On January 11, 2024, the NRC issued an NOV and proposed imposition of a CP in the amount of \$35,000 to Radiation Solutions, LLC, for two SL III violations of NRC License No. 11-35111-01.

Civil Penalties Issued to Fuel Cycle Facilities

None.

Appendix B—Summary of Escalated Notices of Violation without Civil Penalties

Notices of Violation Issued to Operating Reactor Licensees

[Dominion Energy \(North Anna Power Station\) \(EA-24-126\)](#)

Glen Allen, Virginia

On December 11, 2024, the U.S. Nuclear Regulatory Commission (NRC) issued a notice of violation (NOV) associated with a white significance determination process (SDP) finding to Dominion Energy for the failure to meet Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities,” Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” Criterion V, “Instructions, Procedures, and Drawings,” at North Anna Power Station.

[Tennessee Valley Authority \(Browns Ferry Nuclear Plant\) \(EA-24-075\)](#)

Chattanooga, Tennessee

On November 21, 2024, the NRC issued an NOV associated with a white SDP finding to Tennessee Valley Authority for the failure to meet 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” at Browns Ferry Nuclear Plant.

[Constellation Energy Generation, LLC \(James A. Fitzpatrick Nuclear Power Plant\) \(EA-24-088\)](#)

Warrenville, Illinois

On October 29, 2024, the NRC issued an NOV associated with a white SDP finding to Constellation Energy Generation, LLC, for the failure to meet 10 CFR Part 50, Appendix B, Criterion V, and technical specifications at James A. Fitzpatrick Nuclear Power Plant.

[Duke Energy Carolinas, LLC \(Catawba Nuclear Station\) \(EA-24-049\)](#)

York, South Carolina

On September 5, 2024, the NRC issued an NOV associated with a white SDP finding to Duke Energy Carolinas, LLC, for the failure to meet 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” and technical specifications at Catawba Nuclear Station.

[Southern Nuclear Operating Company, Inc. \(Edwin I. Hatch Nuclear Plant\) \(EA-23-139\)](#)

Birmingham, Alabama

On August 27, 2024, the NRC issued an NOV to Southern Nuclear Operating Company, Inc., for a Severity Level (SL) III problem associated with 10 CFR 50.9(a) and 10 CFR 20.1501(a)(2) at Edwin I. Hatch Nuclear Plant, Units 1 and 2.

[Nebraska Public Power District \(Cooper Nuclear Station\) \(EA-24-001\)](#)

Brownville, Nebraska

On April 1, 2024, the NRC issued an NOV to Nebraska Public Power District for an SL III violation of 10 CFR 50.74, “Notification of change in operator or senior operator status,” at Cooper Nuclear Station.

Notices of Violation Issued to Research and Test Reactors

None.

Notices of Violation Issued to Fuel Cycle Facilities Licensees

[BWXT Nuclear Operations Group, Inc. \(EA-24-039\)](#)

Lynchburg, Virginia

On November 13, 2024, the NRC issued an NOV to BWXT Nuclear Operations Group, Inc., for an SL III violation of 10 CFR 70.24(a)(1).

Notices of Violation Issued to Materials Licensees

[McConnell Dowell \(American Samoa\) Ltd. \(EA-24-071\)](#)

Pago Pago, American Samoa

On December 16, 2024, the NRC issued an NOV to McConnell Dowell (American Samoa) Ltd., for an SL III problem associated with License Conditions 12 and 19 of NRC License No. 56-29396-01.

[PSI Wireline \(EA-24-042\)](#)

San Angelo, Texas

On December 10, 2024, the NRC issued an NOV to PSI Wireline for an SL III violation of 10 CFR Part 110, "Export and Import of Nuclear Equipment and Material."

[St. Mary Medical Center – Hobart \(EA-24-054\)](#)

Munster, Indiana

On October 23, 2024, the NRC issued an NOV to St. Mary Medical Center—Hobart for an SL III problem associated with 10 CFR 20.1502(a)(1), 10 CFR 20.1101(a), and 10 CFR 19.12(a)(3).

[Wyoming Cardiopulmonary Services, PC \(EA-24-077\)](#)

Casper, Wyoming

On October 17, 2024, the NRC issued an NOV to Wyoming Cardiopulmonary Services, PC, for an SL III violation of License Condition 11 of NRC License No. 49-27711-01, Amendment No. 7, dated July 25, 2022.

[Guillermo A. Torres-Cabrera, M.D. \(EA-24-041\)](#)

Caguas, Puerto Rico

On September 26, 2024, the NRC issued an NOV to Guillermo A. Torres-Cabrera for an SL III violation of 10 CFR 20.1801, "Security of stored material."

[Titan Inspection, Inc. \(EA-24-005\)](#)

Montoursville, Pennsylvania

On September 3, 2024, the NRC issued an NOV to Titan Inspection, Inc., for an SL III violation of 10 CFR 34.43(c).

[Department of Transportation, Federal Highway Administration \(EA-24-035\)](#)

McLean, Virginia

On August 27, 2024, the NRC issued an NOV to the U.S. Department of Transportation, Federal Highway Administration, for an SL III violation of License Condition No. 12 of NRC License No. 45-23090-01.

[Ascension St. Vincent Hospital \(EA-24-011\)](#)

Indianapolis, Indianapolis

On July 9, 2024, the NRC issued an NOV to Ascension St. Vincent Hospital for an SL III problem and an SL III violation associated with 10 CFR 20.1502, "Conditions requiring individual monitoring of external and internal occupational dose"; 10 CFR 20.1101(a); 10 CFR 19.12(a)(3); and 10 CFR 20.1802, "Control of material not in storage."

[Infrared Roofing Technologies, LLC \(EA-24-021\)](#)

Traverse City, Michigan

On June 3, 2024, the NRC issued an NOV to Infrared Roofing Technologies, LLC, for an SL III violation of 10 CFR 30.34(i).

[Premier Cardiovascular Consultants \(EA-24-012\)](#)

Troy, Michigan

On May 16, 2024, the NRC issued an NOV to Premier Cardiovascular Consultants for an SL III violation of License Condition 11 of NRC Materials License No. 21-35394-01.

[Trinity Health Grand Rapids Hospital \(EA-23-122\)](#)

Grand Rapids, Michigan

On April 2, 2024, the NRC issued an NOV to Trinity Health Grand Rapids Hospital for an SL III problem associated with 10 CFR 20.1802; 10 CFR 20.1501, "General"; 10 CFR 20.2001(a)(1); and 10 CFR 20.2006, "Transfer for disposal and manifests."

[Ionetix Alpha Corporation \(EA-23-142\)](#)

Lansing, Michigan

On April 2, 2024, the NRC issued an NOV to Ionetix Alpha Corporation for an SL III violation of License Condition 19 of NRC License No. 04-35412-02.

[Quality Inspection & Testing, Inc. \(EA-23-145\)](#)

Eunice, Louisiana

On April 1, 2024, the NRC issued an NOV to Quality Inspection & Testing, Inc., for an SL III violation of License Condition 12 of NRC Materials License No. 17-35492-01.

[Ascension Borgess Hospital \(EA-23-109\)](#)

Kalamazoo, Michigan

On April 1, 2024, the NRC issued an NOV to Ascension Borgess Hospital for an SL III violation of 10 CFR 35.40(a).

[Lhoist North America \(EA-23-147\)](#)

Bancroft, Idaho

On March 8, 2024, the NRC issued an NOV to Lhoist North America for an SL III violation of License Condition 12 of NRC Materials License No. 11-27434-01.

[Empire Wireline, LLC \(EA-23-113\)](#)

Manvel, Texas

On March 4, 2024, the NRC issued an NOV to Empire Wireline, LLC, for an SL III violation of 10 CFR 150.20(b).

[Hillsdale County Road Commission \(EA-23-137\)](#)

Hillsdale, Michigan

On February 21, 2024, the NRC issued an NOV to Hillsdale County Road Commission for an SL III problem associated with NRC Materials License No. 21-24942-01 and 10 CFR 20.1101(c).

[North American Testing, Inc. \(EA-23-136\)](#)

Colorado Springs, Colorado

On February 8, 2024, the NRC issued an NOV to North American Testing, Inc., for an SL III violation of 10 CFR 150.20(b)(1) and 10 CFR 150.20(b)(2).

[Construction Materials Technologies, LLC \(EA-23-125\)](#)

West Valley City, Utah

On February 8, 2024, the NRC issued an NOV to Construction Materials Technologies, LLC, for an SL III violation of 10 CFR 30.34(i) and 10 CFR 20.1801.

[KLX Energy Services, LLC \(EA-23-046\)](#)

Houston, Texas

On February 5, 2024, the NRC issued an NOV to KLX Energy Services, LLC, for an SL III violation of 10 CFR 150.20(b).

[Apex Companies, LLC \(EA-23-094\)](#)

Rockville, Maryland

On January 29, 2024, the NRC issued an NOV to Apex Companies, LLC, for an SL III violation of 10 CFR 150.20(b).

[Advanced Isotopes of Idaho \(EA-23-103\)](#)

Pocatello, Idaho

On January 16, 2024, the NRC issued an NOV to Advanced Isotopes of Idaho for an SL III violation of 10 CFR 32.74, "Manufacture and distribution of sources or devices containing byproduct material for medical use," and License Condition 9I of NRC Materials License No. 11-29216-01MD.

[Ascension Providence Rochester Hospital \(EA-23-110\)](#)

Rochester, Michigan

On January 3, 2024, the NRC issued an NOV to Ascension Providence Rochester Hospital for an SL III violation of 10 CFR 20.1802.

Appendix C—Summary of Orders

Orders Issued to Operating Reactor Licensees

None.

Orders Issued to Decommissioning Reactor Licensees

None.

Orders Issued to Individuals

[Mr. David Huey \(IA-24-007\)](#)

On December 12, 2024, the U.S. Nuclear Regulatory Commission (NRC) issued an order prohibiting involvement in NRC-licensed activities for 3 years to Mr. David Huey, a manager for Titan Inspection Inc., for deliberately directing a radiographer to perform radiography without a second qualified individual being present, contrary to Title 10 of the *Code of Federal Regulations* (10 CFR) 30.10(a)(1) and 10 CFR 34.41(a).

Orders Issued to Material Licensees

[Curium US LLC \(EA-21-055\)](#)

St. Louis, Missouri

On June 13, 2024, the NRC issued a confirmatory order (CO) to Curium US LLC, memorializing commitments reached during an alternative dispute resolution (ADR) mediation session. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated civil penalty (CP).

Orders Issued to Nonlicensees

[Glow Rhino, LLC \(EA-23-140\)](#)

Dearborn, Michigan

On October 16, 2024, the NRC issued a CO to Glow Rhino, LLC, memorializing commitments reached during an ADR mediation session. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated CP.

[Mistras Group, LLC \(EA-23-105\)](#)

Heath, Ohio

On May 22, 2024, the NRC issued a CO to Mistras Group, LLC, memorializing commitments reached during an ADR mediation session. As a result of the CO, the NRC will not cite the apparent violation and will not issue an associated CP.

Orders Issued to Fuel Cycle Facilities

None.

Orders Imposing Civil Penalties

[Almonte Geo Service Group \(EA-23-016\)](#)

Toa Alta, Puerto Rico

On April 11, 2024, the NRC issued an order imposing a civil penalty in the amount of \$17,500 to Almonte Geo Service Group. This action was based on a previously issued notice of violation and proposed imposition of CP for the failure to meet 10 CFR 30.36(h).

Appendix D—Summary of Escalated Enforcement Actions against Individuals

Orders

[Mr. David Huey \(IA-24-007\)](#)

On December 12, 2024, the U.S. Nuclear Regulatory Commission (NRC) issued an order prohibiting involvement in NRC-licensed activities for 3 years to Mr. David Huey, a manager for Titan Inspection Inc., for deliberately directing a radiographer to perform radiography without a second qualified individual being present, contrary to Title 10 of the *Code of Federal Regulations* (10 CFR) 30.10(a)(1) and 10 CFR 34.41(a).

Notices of Violation

[Mr. James Bradshaw \(IA-2024-009\)](#)

On October 7, 2024, the NRC issued a notice of violation (NOV) to Mr. James Bradshaw for a Severity Level (SL) III violation of 10 CFR 50.5(a)(2) and 10 CFR 55.53(j).

[Mr. Brian Luketich \(IA-24-006\)](#)

On September 3, 2024, the NRC issued an NOV to Mr. Brian Luketich for an SL III violation of 10 CFR 30.10(a) and 10 CFR 34.41, “Conducting industrial radiographic operations.”

[Mr. Robert Gould \(IA-24-016\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Robert Gould for an SL IV violation of 10 CFR 55.53(e).

[Mr. Eric Beck \(IA-24-015\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Eric Beck for an SL IV violation of 10 CFR 55.53(e).

[Mr. Jonathan Burke \(IA-24-014\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Jonathan Burke for an SL IV violation of 10 CFR 55.53(e).

[Mr. Timothy Schuck \(IA-24-013\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Timothy Schuck for an SL IV violation of 10 CFR 55.53(e).

[Mr. Steven Vonk \(IA-24-012\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Steven Vonk for an SL IV violation of 10 CFR 55.53(e).

[Mr. Lyle Baker \(IA-24-011\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Lyle Baker for an SL IV violation of 10 CFR 55.53(e).

[Mr. Eric Tulson \(IA-24-010\)](#)

On August 30, 2024, the NRC issued an NOV to Mr. Eric Tulson for an SL IV violation of 10 CFR 55.53(e).

[Mr. Travis Hodges \(IA-24-001\)](#)

On August 27, 2024, the NRC issued an NOV to Mr. Travis Hodges for an SL III violation of 10 CFR 50.5, "Deliberate misconduct."

[Mr. Keith Miller \(IA-24-005\)](#)

On April 2, 2024, the NRC issued an NOV to Mr. Keith Miller for an SL III violation of 10 CFR 55.53(k).

[Mr. Jon O'Rullian \(IA-23-015\)](#)

On January 11, 2024, the NRC issued an NOV to Mr. Jon O'Rullian for an SL III violation of 10 CFR 30.3, "Activities requiring license," and License Condition 10 of NRC License No. 11-35111-01.

NRC Closeout Letter—Resulting from a U.S. Department of Justice Action

[Martin Ramos \(IA-23-009\)](#)

On May 22, 2024, the NRC issued a letter to Mr. Martin Ramos, a former Mistras employee, stating that he willfully falsified calibration certificates for nondestructive test equipment that was used at nuclear power plants. After considering a criminal conviction that includes a 2-year ban from participating or being employed in NRC-licensed activities, the NRC has concluded no further action is warranted on this matter.

[Miguel Marcial Amaro \(IA-23-004\)](#)

On May 22, 2024, the NRC issued a letter to Mr. Miguel Marcial Amaro, a former Mistras employee, stating that he willfully falsified calibration certificates for nondestructive test equipment that was used at nuclear power plants. After considering a criminal conviction that includes a 5-year ban from participating or being employed in NRC-licensed activities, the NRC has concluded no further action is warranted on this matter.

Appendix E—Summary of Escalated Enforcement Actions against Nonlicensees (Vendors and Contractors)

Notices of Violation Issued to Nonlicensees

None.

Orders Issued to Nonlicensees

[Glow Rhino, LLC \(EA-23-140\)](#)

Dearborn, Michigan

On October 16, 2024, the U.S. Nuclear Regulatory Commission (NRC) issued a confirmatory order (CO) to Glow Rhino, LLC, memorializing commitments reached during an alternative dispute resolution (ADR) mediation session. As a result of the CO, the NRC will not cite the apparent violations and will not issue an associated civil penalty (CP).

[Mistras Group, LLC \(EA-23-105\)](#)

Heath, Ohio

On May 22, 2024, the NRC issued a CO to Mistras Group, LLC, memorializing commitments reached during an ADR mediation session. As a result of the CO, the NRC will not cite the apparent violation and will not issue an associated CP.

Appendix F—Summary of Cases in Which Enforcement Discretion Was Exercised

Discretion Involving Enforcement Guidance Memorandum

The U.S. Nuclear Regulatory Commission (NRC) exercised enforcement discretion through an enforcement guidance memorandum (EGM) twice in calendar year (CY) 2024, as compared to 16 times in CY 2023:

- On March 13, 2014, the staff issued EGM-14-001, “Interim Guidance for Dispositioning 10 CFR Part 37 Violations with Respect to Large Components or Robust Structures Containing Category 1 or Category 2 Quantities of Material at Power Reactor Facilities Licensed under 10 CFR Parts 50 and 52” (Agencywide Documents Access and Management System Accession No. ML14056A151). This EGM provides staff guidance on the disposition of violations associated with large components or Category 1 or Category 2 quantities of radioactive material stored in robust structures at power reactor facilities. The NRC dispositioned two cases in CY 2024 that met the criteria in this guidance.

Violations Identified during Extended Shutdowns or Work Stoppages

None.

Violations Involving Old Design Issues

None.

Violations Identified Because of Previous Enforcement Action

None.

Violations Involving Certain Discrimination Issues

None.

Violations Involving Special Circumstances

Section 3.5, “Special Circumstances,” of the Enforcement Policy states that the NRC may reduce or refrain from issuing a civil penalty or a notice of violation (NOV) for a Severity Level (SL) II, III, or IV violation based on the merits of the case after considering the guidance in the policy. Factors to be considered are the age of the violation, the significance of the violation, the clarity of the requirement and associated guidance, the appropriateness of the requirement, the overall sustained performance of the licensee, and other relevant circumstances, including any that may have changed since the violation occurred.

The NRC cited section 3.5 of the policy three times in CY 2024 to disposition the following violations of its requirements:

- (1) Department of the Navy (Master Materials Licensee)—On May 30, 2024, the NRC exercised enforcement discretion to not issue a violation to the Department of the Navy. Upon evaluating the noncompliance with regulations, the NRC determined that the licensee, in accordance with its enforcement program, appropriately identified and assessed the issue involving the failure of a Navy master material license permittee to meet a requirement of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 37, “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material.”
- (2) David Surman (licensee)—On September 3, 2024, the NRC exercised enforcement discretion to not issue a violation to David Surman of Allentown, Pennsylvania. Upon evaluating the noncompliance with regulations, the NRC determined that the licensee received and possessed thorium-232 without authorization under 10 CFR Part 40, “Domestic Licensing of Source Material.” Specifically, 10 CFR 40.3, “License requirements,” states that, under most circumstances, a license is required to possess or transfer (sell) products containing source material (including uranium or thorium). Although the violation resulted from the purchase of material sold publicly on the internet, the NRC found that the licensee’s stated intent was not to specifically purchase source material, that the licensee no longer possesses the material, and that the material was of very low significance to public health and safety.
- (3) On July 31, 2024, the NRC issued an NOV to the University of Evansville (licensee) for an SL IV violation. The violation involved the possession of discrete sources containing nonexempt quantities of lead-210, bismuth-210, and polonium-210 without specific authorization, as required by 10 CFR 30.3(a). Additionally, discretion was exercised in not citing an SL IV violation associated with the possession of discrete sources of radium-226 and for failure to submit an amendment request to authorize the activities, as required by 10 CFR 30.3(c)(2).

Use of Discretion in Determining the Amount of a Civil Penalty

None.

Exercise of Discretion to Issue Orders

None.

Notices of Enforcement Discretion

Occasionally, a power reactor licensee’s compliance with a technical specification (TS) or other license condition requires a plant transient or performance testing, inspection, or other system realignment that is of greater risk than the current plant conditions. In these circumstances, the NRC staff may choose not to enforce the applicable requirements. This enforcement discretion is called a “notice of enforcement discretion” (NOED). In accordance with Enforcement Policy Section 3.8, “Notices of Enforcement Discretion for Operating Power Reactors and Gaseous Diffusion Plants,” the staff issues an NOED only if it is satisfied that the action is clearly consistent with protecting public health and safety. The staff may also issue NOEDs in cases involving severe weather or other natural phenomena when it determines that exercising this discretion will not compromise public safety or security.

When requesting an NOED, a licensee must include justification that documents the safety basis for the request and must provide other information that the staff deems necessary for issuing an NOED.

The NRC issued five NOEDs in CY 2024:

- (1) Florida Power & Light Company (licensee)—On March 5, 2024, the NRC granted an NOED to Florida Power & Light Company for TS Limiting Condition for Operation (LCO) 3.8.1.1 at Seabrook Station, Unit 1. The licensee's NOED request involved an extension from 72 hours to 30 days to allow replacement of the 3B reserve auxiliary transformer. The NRC concluded that granting this NOED was consistent with the agency's Enforcement Policy and Manual and had no adverse impact on public health and safety or the environment.
- (2) Pacific Gas and Electric Company (licensee)—On March 25, 2024, the NRC granted an NOED to Pacific Gas and Electric Company for TS LCO 3.0.3 at Diablo Canyon Power Plant, Unit 2. The licensee's NOED request involved a 24-hour extension from entering Mode 3 as directed by TS 3.8.1, "AC Sources—Operating," and TS 3.7.12, "Auxiliary Building Ventilation System (ABVS)." The extension was needed to repair ABVS fan E-1, which provides room cooling to emergency diesel generator 2-2. The NRC concluded that granting this NOED was consistent with the agency's Enforcement Policy and Manual and had no adverse impact on public health and safety or the environment.
- (3) Nebraska Public Power District (licensee)—On April 2, 2024, the NRC granted an NOED to Nebraska Public Power District for TS 3.3.1.1, "Reactor Protection System Instrumentation," at Cooper Nuclear Station. The licensee's NOED request involved a 7-day extension to allow the submission and processing of an emergency TS license amendment request. The license amendment request was associated with limit switches that provide an input to the turbine stop valve closure scram. The NRC concluded that granting this NOED was consistent with the agency's Enforcement Policy and Manual and had no adverse impact on public health and safety or the environment.
- (4) Wolf Creek Nuclear Operating Corporation (licensee)—On August 29, 2024, the NRC granted an NOED to Wolf Creek Nuclear Operating Corporation for TS LCO 3.7.5, "Auxiliary Feedwater System," at Wolf Creek Generating Station. The licensee's NOED request involved an extension from 72 hours to 108 hours to allow repair of an actuator on the turbine speed governing valve for the turbine-driven auxiliary feedwater pump. The NRC concluded that granting this NOED was consistent with the agency's Enforcement Policy and Manual and had no adverse impact on public health and safety or the environment.
- (5) Constellation Energy Generation, LLC (licensee)—On September 26, 2024, the NRC granted an NOED to Constellation Energy Generation, LLC, for TS LCO 3.3.2.1, "Control Rod Block Instrumentation," at James A. FitzPatrick Nuclear Power Plant. The licensee's NOED request involved the request to be allowed one additional reactor startup with the rod worth minimizer inoperable during CY 2024. The NRC concluded that granting this NOED was consistent with the agency's Enforcement Policy and Manual and had no adverse impact on public health and safety or the environment. (Note: The licensee did not use the NOED.)

Violations Involving Certain Construction Issues

None.

Reactor Violations with No Performance Deficiencies

The NRC may exercise discretion for violations of agency requirements by reactor licensees for which there are no associated performance deficiencies (e.g., a violation of a TS which is not a performance deficiency).

The NRC cited Section 3.10, "Reactor Violations with No Performance Deficiencies," of the Enforcement Policy once in CY 2024 to disposition the following violations of its requirements:

- Southern Nuclear Operating Company, Inc. (licensee)—On February 9, 2024, the NRC exercised enforcement discretion in accordance with section 3.10 to not cite Southern Nuclear Operating Company, Inc., for a violation of Joseph M. Farley Nuclear Plant, Unit 2, TS 3.4.10, "Pressurizer Safety Valves." The NRC exercised enforcement discretion because inspectors concluded that there was no performance deficiency associated with the 2A pressurizer safety valve lifting outside of the allowed TS pressure tolerance band as the component failure was not avoidable by reasonable licensee internal procedures or management controls.