



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

June 9, 2025

EAF-RI-2025-0057

Luis O. Garcia, PE,
President Geo Cim, Inc.
Amelia Industrial Park Emma Street, Lot 26A
Guaynabo, PR 00968-8007

SUBJECT: NOTICE OF VIOLATION - GEO CIM, INC. NRC INSPECTION REPORT
030-20896/2025-001

Dear Mr. Garcia:

This letter refers to the remote non-routine inspection conducted from January 20, 2025, through March 4, 2025, to assess activities conducted under your license, as described in your license renewal application ([ML24222A261](#)¹). The inspection evaluated compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules, regulations, and license conditions to ensure public health and safety standards. Within these areas, the inspection consisted of a selected examination of procedures, records, and interviews with personnel.

Based on the results of this inspection, the NRC staff identified one apparent violation (AV) of NRC requirements involving the performance of non-routine maintenance without the NRC's authorization by an unqualified individual. Title 10 of the *Code of Federal Regulations* (10 CFR) Part 30.34(c) requires that each person licensed by the NRC pursuant to the regulations in 10 CFR Part 30 shall confine its use of the byproduct material to the purposes authorized in the license. NRC staff discussed this AV with you and Rolando Davila, Radiation Safety Officer (RSO), during a telephonic exit meeting on March 12, 2025, and described the AV in NRC Inspection Report No. 030-20896/2025-001 that was issued on April 1, 2025 ([ML25069A621](#)).

In the letter transmitting the report, we informed you that the AV was being considered for escalated enforcement action and provided you with the opportunity to address the AV by either attending a pre-decisional enforcement conference or by providing a written response before we made our final enforcement decision. In a letter dated May 5, 2025 ([ML25126A164](#)), you provided a written response that described the actions taken and planned by Geo Cim, Inc. to address the AV, as described below.

¹ NRC Agencywide Documents Access and Management System (ADAMS) Accession Numbers listed in this letter may be accessible using the hyperlink below with the associated ADAMS Accession Number inserted in place of the "ML" at the end: <https://www.nrc.gov/docs/ML>

Based on the information identified during the inspection and the information that you provided in your May 5, 2025, letter, the NRC has determined that a violation of NRC requirements occurred. The violation is cited in the enclosed Notice of Violation (Notice), provided as Enclosure 1 to this letter. The circumstances surrounding the violation were previously described in detail in the subject inspection report referenced above. The violation involved Geo Cim, Inc., on three occasions, engaging in non-routine maintenance entailing the removal of the source rod from a portable nuclear gauge without prior NRC authorization. The NRC considered the violation to be significant because of the increased potential for elevated radiation exposures to occupational workers and members of the public from the non-routine maintenance performed on the portable nuclear gauge. Therefore, this violation has been categorized in accordance with the NRC Enforcement Policy at Severity Level III (SL III).

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$9,000 is considered for a SL III violation. Because your facility has not been the subject of escalated enforcement action within the last two inspections, the NRC considered whether credit was warranted for Corrective Action in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. The NRC concluded that credit is warranted for Corrective Action because Geo Cim, Inc. ceased all non-routine maintenance actions and committed to sending gauges to the manufacturer for repairs when necessary. Additionally, Geo Cim, Inc. updated procedures to explicitly require any issue beyond routine maintenance to be referred to an authorized service provider; implemented mandatory annual refresher training for all staff handling nuclear gauges, including specific training on NRC regulations and license conditions; and put into effect RSO verification and documentation of compliance with license limitations prior to maintenance activity authorization.

Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty. In addition, issuance of this SL III violation constitutes escalated enforcement action that may subject you to increased inspection effort.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in NRC Inspection Report No. 030-20896/2025-001 and in your letter dated May 5, 2025. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, should you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room and in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-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 personal privacy or proprietary information is necessary to provide an acceptable response, please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such information, you must specifically identify the portions of your response that you seek to have withheld and provide in

detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). The NRC also includes significant enforcement actions on its Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/current.html>

If you have any questions related to this matter, please contact Monica Ford of my staff at (610) 337-5214 or Monica.Ford@nrc.gov.

Sincerely,

Andrea L. Kock
Regional Administrator

Enclosure:
Notice of Violation

Docket No. 030-20896
License No. 52-17776-02

cc w/ Enclosure:
Rolando Davila, RSO

SUBJECT: NOTICE OF VIOLATION - GEO CIM, INC. NRC INSPECTION REPORT
030-20896/2025-001 DATED JUNE 9, 2025

Distribution:

SECY	RIDSSECYMAILCENTER
OEMAIL, OEWEB	
M Gavrilas, EDO	
R Lewis, EDO	
T. Steadham, EDO	
D Pelton, OE	RIDSOEMAILCENTER
J Cai, OE	
J Peralta, OE	
L Sreenivas, OE	
D Silberfeld, NMSS	RIDSNMSSOD RESOURCE
M Burgess, NMSS	
A Miller, NMSS	
C. Einberg, NMSS	
Enforcement Coordinators	
RII, RIII, RIV (M Kowal; D Betancourt-Roldan; B Alferink)	
H Harrington, OPA	RIDSOPAMAILCENTER
R Feitel, OIG	RIDSOIGMAILCENTER
D D'Abate, OCFO	RIDSOCFOMAILCENTER
R Carpenter, OGC	
C Regan, DRSS, RI	R1DRSSMAILRESOURCE
M Ferdas, DRSS, RI	
M Ford, DRSS, RI	
J vonEhr, DRSS, RI	
K Trotter, DRSS, RI	
S Burnell, OPA	
S Seeley, SAO-RI	
R Erickson, SAO-RI	
B Klukan, ORA, RI	
R1Enforcement.Resource	

DOCUMENT NAME: [Geo Cim Final Action \(EAF-RI-2025-0057\).docx](#)

Public Designation Category: Publicly Available MD 3.4

ADAMS ACCESSION NO. ML25150A050

x SUNSI Review		x Non-Sensitive (Safety) Sensitive (Security Addendum)		x Publicly Available (Safety) Non-Publicly Available (Security Addendum)				
OFFICE	RI: ORA	RI: ORA	RI: ORA	RI: DRSS	OE	RI: DRSS	RA	
	LCasey	MMcLaughlin	BKlukan	MFord	LSreenivas	JZimmerman	AKock	
DATE	5/20/25	5/20/25	5/21/25	5/23/25	5/29/25	5/29/25	6/9/25	

OFFICIAL RECORD COPY

ENCLOSURE 1

NOTICE OF VIOLATION

Geo Cim, Inc.
Guaynabo, Puerto Rico

Docket No.: 030-20896
License No.: 52-17776-02
EAF-RI-2025-0057

During a remote non-routine inspection conducted from January 20, 2025, through March 4, 2025, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 30.34(c), "Terms and Conditions of Licenses," states, in part, that each person licensed by the Commission pursuant to the regulations in 10 CFR Part 30 shall confine its use of the byproduct material to the purposes authorized in the license.

NRC License No. 52-17776-02, Amendment No. 09, Condition 14, stated that sealed sources or source rods containing licensed material shall not be opened or sources removed or detached from source rods or gauges by the licensee, except as specifically authorized.

NRC License No. 52-17776-02, Amendment No. 09, Condition 17, stated that any cleaning, maintenance, or repair of the gauges that require detaching the source or source rod from the gauge shall be performed only by the manufacturer or by other persons specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to perform such services.

Contrary to the above, on three occasions between June 2023 and December 2024, Geo Cim, Inc. failed to confine its use of the byproduct material to the purposes authorized in the license. Specifically, the licensee performed non-routine maintenance on its portable nuclear gauges, which involved the removal of the source rod, and failed to seek or receive approval by the NRC.

This is a Severity Level III violation (Enforcement Policy Example 6.3.c.5)

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved, is already adequately addressed on the docket in NRC Inspection Report No. 030-20896/2025-001 and in your letter dated May 5, 2025. Therefore, you are not required to respond to this Notice of Violation (Notice). However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, (EAF-RI-2025-0057)," and send it 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 Rd., Suite 102, King of Prussia, PA 19406 within 30 days of the date of the letter transmitting this Notice.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 9th day of June, 2025.