



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

September 10, 2025

EAF-RI-2025-0103

Fred Miller
Northeast Regional HSSE Manager
and U.S. Radiation Safety Officer
Stantec Consulting Services
810 Glen Eagles Ct., Suite 300
Baltimore, MD 21286

**SUBJECT: NOTICE OF VIOLATION - STANTEC CONSULTING SERVICES –
INSPECTION REPORT 150-00016/2025001**

Dear Fred Miller:

This letter refers to our remote non-routine inspection conducted between January 14, 2025, and April 11, 2025, related to your performance of activities authorized by your Kentucky license in the State of Indiana, a non-Agreement State that is under the jurisdiction of the U.S. Nuclear Regulatory Commission (NRC). Based on the results of this review, the NRC staff identified one apparent violation (AV) of NRC requirements involving the failure by Stantec Consulting Services (Stantec) to file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of the Agreement State specific license, and the appropriate fee with the appropriate regional office at least 3 days prior to engaging in licensed activities in areas of exclusive Federal jurisdiction for calendar years 2021 through 2024.

NRC staff discussed the AV with you, during a telephonic exit meeting on June 25, 2025, and described the AV in NRC Inspection Report No. 150-00016/2025001 that was issued on June 25, 2025 ([ML25176A110](#)¹). In the letter transmitting the inspection report and AV, we provided you with the opportunity to address the AV identified in the report 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 August 11, 2025 ([ML25230A015](#)), you provided a written response in which you requested the violation be reduced to *No Action* or, alternatively, a *Minor Violation* due to the issue being isolated and in consideration that it did not involve a safety incident and that you implemented corrective actions which have, thus far, prevented recurrence. You also provided a description of these corrective actions, as further discussed below. In addition, you referenced NRC Inspection Manual Chapter (IMC) 0612 Appendix E "Examples of Minor Issues," and noted that some of the examples of minor violations described in this document include "record keeping issues" and "insignificant procedural errors." You described the subject violation committed by Stantec as "less serious than these examples," in that, there was no safety impact and procedures directed to Stantec were complied with.

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>

The NRC staff considered the information you provided in your response, as well as the information developed during the inspection, and determined that a violation of NRC requirements has occurred. The violation, which is cited in the enclosed Notice of Violation (Notice) involved Stantec's failure to file for reciprocity in calendar years 2021 through 2024. Title 10 of the *Code of Federal Regulations* (10 CFR) 30.3 requires, in part, that except for persons exempt as provided in 10 CFR Parts 30 and 150, no person shall manufacture, produce, transfer, receive, acquire, own, possess, or use byproduct material except as authorized in a specific or general license issued pursuant to the regulations in 10 CFR Part 30. 10 CFR 150.20(a) states, in part, that any person who holds a specific license from an Agreement State is granted an NRC general license to conduct the same activity in non-Agreement States subject to the provisions of 10 CFR 150.20(b). 10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in non-Agreement States shall, at least 3 days before engaging in each such activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee, with the Regional Administrator of the appropriate NRC regional office.

The NRC staff assesses the significance of violations by nuclear materials users in accordance with the NRC's Enforcement Policy (Policy) ([ML25224A097](#)). As described in Section 2.2.1 of the Policy, the NRC considers four factors in determining the significance of a violation: (1) whether the violation resulted in actual safety or security consequences; (2) whether the violation had potential safety or security consequences; (3) whether the violation impacted the ability of the NRC to perform its regulatory oversight function; and (4) whether the violation involved willfulness. As you noted in your response, this violation by Stantec did not involve an actual safety consequence. Furthermore, the NRC staff did not identify that the violation involved willfulness or a significant likelihood of potential consequences. However, the NRC considers Stantec's failure to file for reciprocity to be of moderate significance because it occurred on numerous occasions such that NRC staff were not informed of activities occurring within the NRC's jurisdiction and, consequently, were not provided an opportunity to inspect the activities. Section 6.9.c.2.c of the Policy includes a Severity Level III (SL III) example violation for failure to submit an initial NRC Form 241, "Report of Proposed Activities in Non-Agreement States," as required by 10 CFR 150.20, "Recognition of Agreement State Licenses." Therefore, this violation has been categorized in accordance with the NRC Enforcement Policy at 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 years, 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 Stantec's corrective actions taken to address the violation. Specifically, Stantec promptly applied for and was granted reciprocity from the NRC. In addition, Stantec has implemented administrative controls to verify jurisdiction prior to beginning work.

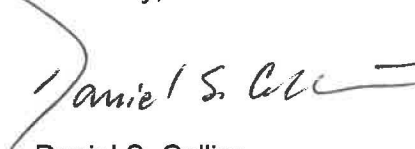
Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant 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. 150-00016/2025001 and in your letter dated August 11, 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 and Procedure," 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,



Daniel S. Collins
Acting Regional Administrator

Docket No. 150-00016
License No. KY-201-142-51

Enclosure: Notice of Violation

cc w/ Enclosure:
Ryan Clark, Radiation Safety Officer
Commonwealth of Kentucky
NRC Region III

NOTICE OF VIOLATION

Stantec Consulting Services
Baltimore, MD

Docket No. 150-00016
License No. KY-201-142-51
EAF-RI-2025-0103

During an NRC inspection conducted between January 14, 2025, and April 11, 2025, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 30.3(a) requires, in part, that except for persons exempt as provided in 10 CFR Parts 30 and 150, no person shall manufacture, produce, transfer, receive, acquire, own, possess, or use byproduct material except as authorized in a specific or general license issued pursuant to the regulations in 10 CFR Part 30.

10 CFR 150.20(a) states, in part, that any person who holds a specific license from an Agreement State is granted an NRC general license to conduct the same activity in non-Agreement States subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in non-Agreement States shall, at least 3 days before engaging in each such activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee, with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, between October 10, 2021, and December 30, 2024, Stantec Consulting Services, which is authorized for possession and use of radioactive material under a Kentucky Agreement State license, used byproduct material within NRC jurisdiction, on numerous occasions, without either a specific license issued by the NRC or having submitting Form 241 and the required fee for calendar years 2021-2024 with the Regional Administrator of the appropriate NRC regional office.

This is a Severity Level III violation (Enforcement Policy Example 6.9.c.2.c)

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 will be achieved, is already adequately addressed on the docket in your letter dated July 21, 2025. 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-2025-0103)", 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 Road, Suite 102, King of Prussia, PA, 19406-1415, and emailed to R1Enforcement@nrc.gov within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

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 10th day of September, 2025

SUBJECT: NOTICE OF VIOLATION - STANTEC CONSULTING SERVICES; INSPECTION
REPORT 150-00016/2025001 DATED SEPTEMBER 10, 2025

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ADAMS ACCESSION NUMBER: **ML25239B569**

X SUNSI Review/		X Non-Sensitive □ Sensitive			X Publicly Available □ Non-Publicly Available	
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DATE	08/20/2025	08/21/25	8/28/25	8/26/25	9/03/25	9/04/25
OFFICE	RI/DRSS	RI/ORA				
NAME	C Regan	D Collins				
DATE	9/04/25	9/10/25				

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