

NRC FORM 591M PART 1  
(10-2011)\*  
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

## SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

## 1. LICENSEE/LOCATION INSPECTED:

Pennoni Associates, Inc.  
3602 Horizon Drive, Suite 180  
King of Prussia, PA 19406

## 2. NRC/REGIONAL OFFICE

U.S. Nuclear Regulatory Commission  
Region I, 2100 Renaissance Blvd, Suite 100  
King of Prussia, Pennsylvania 19406-2713

REPORT NUMBER(S) 2012-001

## 3. DOCKET NUMBER(S)

030-17570

## 4. LICENSE NUMBER(S)

37-17637-02

## 5. DATE(S) OF INSPECTION

June 14, &amp; June 20, 2012

## LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- ☐ 1. Based on the inspection findings, no violations were identified.
- ☐ 2. Previous violation(s) closed.
- ☐ 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

Non-cited violation(s) were discussed involving the following requirement(s) and corrective action(s):

- ☒ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

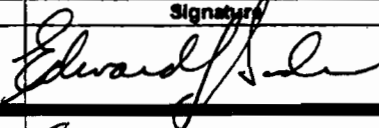
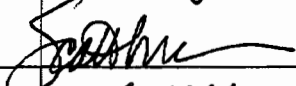

1. 10 CFR 20.2102(a)(2) requires, in part, that the licensee maintain records of the radiation protection program, including audits and other reviews of program content and implementation.

Contrary to the above, Pennoni Associates, Inc. did not maintain records of reviews of program content and implementation for the years 2008, 2009, and 2010. The licensee stated that the requirement was not fully understood. The licensee took corrective actions in January 2012, by conducting and documenting a review of the program content and implementation for the year 2011, and implemented an automated reminder system to notify the RSO to perform and document program reviews.

(continued on next page)

## Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE	Edward J. Sander		6/20/12
NRC INSPECTOR	Scott Wilson		6/20/2012
BRANCH CHIEF	Blake Welling		6/20/2012

\*NRC FORM 591M PART 1 (10-2011) (RI Rev. 02/09/2012) G:\DNMS\WordDocs\Current\Insp Record\R37-17637-02.2012-001.591M-Part1.doc

SUNSI Review Completed By: Scott Wilson

☒ Public

☒ Non-Sensitive

This document becomes an NRC Official Agency Record once it is signed by the Branch Chief

NRC FORM 591M PART 2 (10-2011) 10 CFR 2.201		U.S. NUCLEAR REGULATORY COMMISSION	
SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION			
1. LICENSEE/LOCATION INSPECTED;  Pennoni Associates, Inc. 3602 Horizon Drive, Suite 160 King of Prussia, PA 19406  REPORT NUMBER(S) 2012-001		2. NRC/REGIONAL OFFICE  U.S. Nuclear Regulatory Commission Region I, 2100 Renaissance Blvd, Suite 100 King of Prussia, Pennsylvania 19406-2713	
3. DOCKET NUMBER(S)  030-17570	4. LICENSE NUMBER(S)  37-17637-02	5. DATE(S) OF INSPECTION  June 14, & June 20, 2012	
<p>(Continued)</p> <p>2. NRC License 37-17637-02, Condition 16, requires, in part, that the licensee conduct a physical inventory every six months to account for all sources and/or devices received and possessed under the license, and those records of inventories shall be maintained for 5 years.</p> <p>Contrary to the above, between January 2007 and January 2012, Pennoni Associates, Inc. did not conduct a physical inventory every six months. Specifically, Pennoni Associates, Inc. conducted physical inventories every twelve months for the years 2007, 2008, 2009, 2010, and 2011. The licensee stated that this violation was due to an oversight on their part. The licensee had already taken corrective actions by completing a physical inventory in January of 2012, and by implementing an automated reminder system to notify the RSO to perform inventories every six months.</p>			