



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

July 25, 2014

Docket No. 03038463

License No. 52-31446-01

Ivan Usero-Perez
President & Radiation Safety Officer
Geopractica, Inc.
P.O. Box 19034
San Juan, PR 00910-1034

SUBJECT: NRC INSPECTION REPORT NO. 03038463/2014001, GEOPRACTICA, INC.,
SAN JUAN, PUERTO RICO SITE AND THE TEMPORARY JOB SITE IN
BAYAMON, PUERTO RICO, AND NOTICE OF VIOLATION

Dear Mr. Usero-Perez:

On June 23 & 24, and continuing in-office through July 23, 2014, Todd Jackson of this office conducted a safety inspection at the above address and the temporary job site in Bayamon, Puerto Rico of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selective examination of representative records. Additional information provided in the telephone conversation on July 23, 2014, between you and Todd Jackson of this office was also examined as part of the inspection. The findings of the inspection were discussed with you at the conclusion of the inspection.

Based on the results of this inspection and in accordance with the NRC Enforcement Policy, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. The violations involved: 1) the failure to perform the required inventory of licensed materials; and, 2) the failure to perform required leak tests.

The violations are cited in the enclosed Notice of Violation (Notice), because the violations were identified by the NRC. Also, items A and B as listed in the Notice are repeat violations that were identified during previous inspections of your licensed program. These were documented in the Notice of Violation enclosed with our letter dated July 2, 2012. Although we had verified that you took corrective action to address the previous violations, the current violations are of concern, because your preventative actions were not effective in preventing recurrence and indicate a lack of attention to detail. The NRC expects licensees to conduct their programs with meticulous attention to detail and high standards of safety and compliance.

During our inspection exit meeting on July 23, 2014, you indicated that leak tests had been performed on June 23, 2014, at the time of the NRC inspection and that results for those tests were satisfactory. You stated that you have taken corrective and preventative actions to address each violation and that Geopractica is committed to radiation safety and to compliance with NRC regulations and licensed conditions.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC website 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.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Please contact Todd Jackson at 610-337-5308 if you have any questions regarding this matter.

Sincerely,

Original signed by Blake Welling

Blake Welling, Chief
Commercial, Industrial, R&D and Academic
Branch
Division of Nuclear Materials Safety

Enclosure:
Notice of Violation

cc: Commonwealth of Puerto Rico

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Original signed by Blake Welling
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Enclosure:

Notice of Violation

cc: Commonwealth of Puerto Rico

Distribution:

B. Bickett, RI

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OFFICE	DNMS/RI	N	DNMS/RI		DNMS/RI		
NAME	TJackson/tj		BWelling/bw				
DATE	7/23/14		7/25/14				

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Geopractica, Inc.
San Juan, PR

Docket No. 03038463
License No. 52-31446-01

During an NRC inspection conducted on June 23 & 24, and continuing in-office through July 23, 2014, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. NRC License No. 52-31446-01, Condition 15 requires that the licensee conduct a physical inventory every six months, or at intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sources and /or devices received and possessed under the license.

Contrary to the above, the licensee did not conduct a physical inventory every six months to account for all sources and/or devices possessed under the license. Specifically, as of June 23, 2014, the licensee possessed five Seaman Nuclear Corporation Model C-200 portable gauges and had not conducted a physical inventory since August 13, 2012, a period greater than six months.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

- B. NRC License No. 52-31446-01, Condition 14.A. requires that sealed sources shall be tested for leakage and/or contamination at intervals not to exceed six months or at intervals specified in the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or under equivalent regulations of an Agreement State. The Seaman Nuclear Corporation sealed source and device registry no. NR-0587-D-104-S specifies a leak test frequency of six months.

Contrary to the above, the licensee had not conducted tests for leakage and/or contamination on sealed sources as specified in the certificate of registration. Specifically, as of June 23, 2014, an interval exceeding six months had elapsed since the most recent leak tests performed on August 13, 2012. The licensee had used Seaman Nuclear Corporation gauge L-530 on June 18, 19, 20 and 23, 2014, which were after the date on which the leak test was due.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

Pursuant to the provisions of 10 CFR 2.201, Geopractica, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the

correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

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

Dated This 25th day of July 2014