

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

Western Water Consultants, Inc.  
dba WWC Engineering  
1849 Terra Avenue  
Sheridan, Wyoming 82801  
Location Inspected:  
5810 E. 2<sup>nd</sup> Street, Suite 200, Casper, Wyoming  
REPORT NO: 030-31005/2015-002

2. NRC/REGIONAL OFFICE

U.S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

3. DOCKET NUMBER

030-31005

4. LICENSE NUMBER

49-26979-01

5. DATE OF INSPECTION

July 27, 2015

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.

X 3. The violations, 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.

1 Non-Cited Violation was discussed involving the following requirements and Corrective Actions:

License Condition 20 of NRC License 49-26979-01 requires, in part, that the licensee is authorize to transport licensed material only in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material." 10 CFR 71.5(a) requires, in part, that each licensee who transports licensed material outside the site of usage, as specified in the NRC license, or where transport is on public highways, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the US Department of Transportation (DOT) regulations in 49 CFR Parts 107, 171 through 180, and 390 through 397, appropriate to the mode of transport. 49 CFR 172.704(c)(2) requires, in part, that hazmat employees must receive the training required by 49 CFR 172 Subpart H at least once every three years.



Contrary to the above, on July 22, 2015, the licensee failed to ensure that hazmat employees received the training required by 49 CFR 172 Subpart H at least once every three years. Specifically, at least two hazmat employees transported Class 7 radioactive material in a portable gauge on public highways and did not have recurrent hazmat training in accordance with 49 CFR 172 Subpart H. One employee last received recurrent training in August 2011 and the other in September 2011, and transported the gauge after August and September 2014, respectively, a period in excess of three years. The licensee identified this violation during an audit conducted on July 22, 2015.

On August 5, 2015, the licensee discussed with the inspector its plan for implementing corrective actions. These corrective actions included arranging for all individuals with expired training to take an online course that will satisfy the requirements of 49 CFR 172 Subpart H. The licensee stated that the training for all individuals with expired training is expected to be completed by August 19, 2015, and the individuals will not transport Class 7 radioactive material until the training is completed. The licensee has also identified which employees will require recurrent training in 2016 and has noted this in a task list so that it will be accomplished before the respective expiration dates in 2016.

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

Licensee's Statement of Corrective Actions for Item 4, above.

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 | GARRETT ZIMMER              |  | 8/6/2015 |
| NRC INSPECTOR             | Janine F. Katanic, PhD, CHP |  | 8/6/2015 |
| BRANCH CHIEF              | G. Michael Vasquez          |  |          |

☐ Non-Public

☐ Sensitive - Security-Related

☒ Public

☒ Non-Sensitive

## Katanic, Janine

---

**From:** Garrett Zimmer <gzimmer@wwcengineering.com>  
**Sent:** Thursday, August 06, 2015 3:45 PM  
**To:** Katanic, Janine  
**Subject:** [External\_Sender] RE: NRC inspection of WWC Casper  
**Attachments:** Safety Inspection Report & Compliance Inspection - WWC.pdf

Janine,

Thank you for the guidance and helping improve our Radiation Safety Program. Attached is the signed report. If you need anything else please feel free to call or email me.

Regards,  
Garrett



Garrett Zimmer | Associate Civil Engineer  
5810 East 2<sup>nd</sup> Street, Suite 200 | Casper, WY 82609  
Tel. 307-473-2707 | Cell 307-315-1745  
<http://www.wwcengineering.com/>

---

**From:** Katanic, Janine [mailto:Janine.Katanic@nrc.gov]  
**Sent:** Thursday, August 06, 2015 12:29 PM  
**To:** Garrett Zimmer  
**Subject:** NRC inspection of WWC Casper

Garrett,

As discussed, I have attached the NRC inspection report for the inspection conducted at your Casper, WY facility on July 27, 2015. The one Non-Cited violation regarding recurrent Hazmat training is noted. This violation is not being cited because you identified it, it wasn't repetitive, it wasn't done intentionally, and you have identified the corrective actions you are taking to achieve compliance. Please review the text in the attached Inspection Report. If you have any questions, let me know. Otherwise, please print your name as the licensee representative, sign, and date the form, and scan it and return it to me. No other actions are necessary and this will conclude the inspection.

Regards,  
Janine

Janine F. Katanic, PhD, CHP  
Senior Health Physicist  
US Nuclear Regulatory Commission  
Region IV  
Division of Nuclear Materials Safety  
office: 817-200-1151  
email: [Janine.Katanic@nrc.gov](mailto:Janine.Katanic@nrc.gov)