



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

May 25, 2016

Docket No. 03038699

License No. 45-35118-01

Chris Vargo
President
Dominion NDT Services, Inc.
1705 Florence Avenue
Chester, VA 23836

SUBJECT: NRC INSPECTION REPORT NO. 03038699/2016001, DOMINION NDT SERVICES, INC., CHESTER, VIRGINIA SITE AND NOTICE OF VIOLATION

Dear Mr. Vargo:

On March 24, 2016, Randolph Ragland of this office conducted a safety inspection at 2204 Commerce Road, Richmond, Virginia, of activities authorized by the above listed NRC license. The inspection continued in-office until May 5, 2016. 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 a telephone conversation on April 27, 2016, between you and Randolph Ragland of this office was also examined as part of the inspection. The findings of the inspection were discussed with you and Mr. Norman Boggs of your office at the conclusion of the inspection on May 5, 2016.

Based on the results of this inspection and in accordance with the NRC Enforcement Policy, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involved the failure to conduct a source misconnect test in accordance with the QSA Operating Maintenance Manual, as required by your license commitments.

The violation is cited in the enclosed Notice of Violation (Notice), because the violation was identified by the NRC.

During our inspection exit meeting on May 5, 2016, you indicated that this violation occurred due to a lack of attention to detail. You stated that you have taken corrective and preventative actions to address the violation and that Dominion NDT is committed to radiation safety and to compliance with NRC regulations and licensed conditions. Further, you stated verbally that you have taken the following corrective and preventative actions:

- 1) Completed a quarterly source misconnect test on your QSA radiography cameras, source assemblies, and drive cables in accordance with QSA's Operating and Maintenance manual;
and
- 2) Added procedural steps to Dominion NDT Services procedure for performing quarterly misconnect tests.

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 is already adequately addressed in our records. Therefore, you are not required to respond to this letter unless the description of your corrective actions in this letter 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, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system, the Agencywide Document Access and Management 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.

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 individual 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 the 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.

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).

Please contact Randolph Ragland at 610-337-5083 if you have any questions regarding this matter.

Sincerely,

/RA/

Monica L. Ford, Acting Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety

Enclosure:
Notice of Violation

C. Vargo

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cc w/Encl: Norman C Boggs, Radiation Safety Officer
Commonwealth of Virginia

C. Vargo

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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 is already adequately addressed in our records. Therefore, you are not required to respond to this letter unless the description of your corrective actions in this letter 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.

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Monica L. Ford, Acting Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety

Enclosure:

Notice of Violation

cc w/Encl: Norman C Boggs, Radiation Safety Officer
Commonwealth of Virginia

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OFFICE	DNMS/RI	N	DNMS/RI				
NAME	RRagland		MFord/mlf				
DATE	05/18/2016		05/25/16				

NOTICE OF VIOLATION

Dominion NDT Services, Inc.
Chester, VA

Docket No. 03038699
License No. 45-35118-01

During an NRC safety inspection conducted on March 24, 2016, and continued in-office until May 5, 2016, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Dominion NDT Services, Inc., NRC License No. 45-35118-01, Condition 18 A, Application dated December 4, 2013, specifies that quarterly maintenance [for radiography cameras] will be performed in accordance with Dominion NDT Services [procedure] ROEM-Part B, Chapters 7. Step 2.2 of that procedure, specifies that quarterly inspections and maintenance shall be performed in accordance with the manufacturer's recommendations.

QSA's Operating and Maintenance Manual, dated September 2015, requires, that following quarterly maintenance on a QSA Model 880 D radiography camera, a source "misconnect test" must be conducted on the exposure device including the radioactive source assembly and remote controls, to test the integrity of the entire locking system.

Contrary to the above, from February 11, 2014, to March 24, 2016, Dominion NDT Services, Inc. did not fully conduct quarterly inspections and maintenance [for radiography cameras] in accordance with the manufacturer's recommendations. Specifically, on a quarterly basis, the licensee did not conduct source "misconnect tests" on QSA Model 880 D cameras including the radioactive source assembly and remote controls to test the integrity of the entire locking system on the exposure device.

This is a Severity Level IV violation (Section 6.7).

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. 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," and send it 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).

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 May 2016