



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

March 12, 2018

EA-18-015

Mr. Bruce Karie
Corporate Radiation Safety Officer
Acuren Inspection, Inc.
ADBA WIT Pipeline
4566 Abrahamson Road
Duluth, MN 55811

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03038913/2017005 (DNMS) –
ACUREN INSPECTION, INC. ADBA WIT PIPELINE

Dear Mr. Karie:

On December 15, 2017, and January 17, 2018, inspectors from the U.S. Nuclear Regulatory Commission (NRC) conducted routine inspections at your facilities in Rochester, Hemlock, and Midland, Michigan, with continued in-office review through February 20, 2018. The purpose of the inspection was to review activities performed under your NRC license to ensure that activities were being performed in accordance with NRC requirements. The in-office review included additional evaluation of inspection findings by NRC regional and headquarters staff. The enclosed inspection report (Enclosure 1) and its non-public Security Addendum (Enclosure 2) presents the results of the inspection.

During this inspection, the NRC staff examined activities conducted under your license related to public health and safety. Additionally, the staff examined your compliance with the Commission's rules and regulations as well as the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, an apparent violation of NRC requirements was identified and is being considered for escalated enforcement action in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is of a security-related nature. Details of the violation, as well as the corrective actions that have since been taken to restore compliance with regulatory requirements, are discussed in Enclosure 2.

Enclosure 2 contains Sensitive Unclassified Non-Safeguards Information. When separated from Enclosure 2, this transmittal letter and Enclosure 1 are decontrolled.

B. Karie

2

Because the NRC has not made a final determination in this matter, the NRC is not issuing a Notice of Violation for this inspection finding at this time. Messrs. Ryan Craffey, Luis Nieves and Aaron McCraw of my staff discussed the circumstances surrounding this apparent violation, the significance of the issue, and the need for lasting and effective corrective action with you and Mr. Don Flett of your staff on February 27, 2018.

Before the NRC makes its enforcement decision, we are providing you an opportunity to either: (1) respond in writing to the apparent violation addressed in this inspection report within 30 days of the date of this letter; or (2) request a Predecisional Enforcement Conference (PEC). **Please contact Aaron McCraw at 630-829-9650 or aaron.mccraw@nrc.gov within ten days of the date of this letter to notify the NRC of your intended response.**

If you choose to provide a written response, it should be clearly marked as "Response to the Apparent Violation in Inspection Report No. 03038913/2017005(DNMS); EA-18-015," and should include, for the apparent violation: (1) the reason for the apparent violation, or, if contested, the basis for disputing the apparent 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 was or will be achieved. In presenting your corrective actions, you should be aware that the promptness and comprehensiveness of your actions will be considered in assessing any civil penalty for the apparent violation. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be useful in preparing your response. You can find the information notice on the NRC website at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1996/in96028.html>. Please mark your entire response, "Security-Related Information – Withhold from Public Disclosure under Title 10 of the *Code of Federal Regulations* (CFR) 2.390." In accordance with 10 CFR 2.390(b)(ii), the NRC is waiving the affidavit requirements for your response to this letter. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information. Your response may reference or include previously docketed correspondence, if the correspondence adequately addresses the required response. Your response should be sent to the NRC's Document Control Center, with a copy mailed to the Region III Office, 2443 Warrenville Road, Suite 210, Lisle, Illinois 60532, within 30 days of the date of this letter. If an adequate response is not received within the time specified or an extension of time has not been granted, the NRC will proceed with its enforcement decision or schedule a PEC.

If you choose to request a PEC, it will afford you the opportunity to provide your perspective on the apparent violation and any other information that you believe the NRC should take into consideration before making an enforcement decision. The topics discussed during the conference may include the following: information to determine whether a violation occurred, information to determine the significance of a violation, information related to the identification of a violation, and information related to any corrective actions taken or planned to be taken. If a PEC is held, the NRC will issue a press release to announce the time and date of the PEC. The PEC will be closed to public observation due to the security-related nature of the finding.

As you have not been the subject of escalated enforcement action within the last two years, a civil penalty may not be warranted in accordance with Section 2.3.4 of the Enforcement Policy. Based upon NRC's understanding of the facts and your corrective actions, it may not be necessary to conduct a PEC in order to enable the NRC to make a final enforcement decision. Our final decision will be based on your confirming on the license docket that the corrective actions previously described to the staff have been or are being taken.

B. Karie

3

Please be advised that the number and characterization of the apparent violation described in the enclosed inspection report may change as a result of further NRC review. You will be advised by separate correspondence of the results of our deliberations on this matter.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and Enclosure 1 will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agency wide Documents Access Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. However, Enclosure 2 and your written response, if you choose to provide one, will not be made available electronically for public inspection because of the security-related information that is or would be contained in each.

Please feel free to contact Mr. Craffey of my staff if you have any questions regarding this inspection. Mr. Craffey can be reached at 630-829-9655.

Sincerely,

/RA/

John B. Giessner, Director
Division of Nuclear Materials Safety

Docket No. 030-38913
License No. 22-27593-01

Enclosures:

1. IR 03038913/2017005(DNMS) (public)
2. Security Addendum (non-public)

cc w/encls: Mr. Don Flett, Rochester
Operations Manager
cc w/encl 1: State of Minnesota
State of Michigan

B. Karie

4

Letter to Bruce Karie from John Giessner, dated March 12, 2018

SUBJECT: NRC INSPECTION REPORT NO. 03038913/2017005(DNMS) – ACUREN
INSPECTION, INC. ADBA/WIT PIPELINE

DISTRIBUTION w/encl:

Steven West
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DATE	03/06/18		03/07/18		03/08/18		03/09/18	
OFFICE	RIII-DNMS	C						
NAME	JGiessner							
DATE	03/12/18							

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**U.S. Nuclear Regulatory Commission
Region III**

Docket No.	030-38913
License No.	22-27593-01
Report No.	03038913/2017005(DNMS)
EA No.	EA-18-015
Licensee:	Acuren Inspection, Inc. ADBA WIT Pipeline
Facilities:	277 South Street, Rochester, MI 12334 Geddes Road, Hemlock, MI 3901 S. Saginaw Street, Midland, MI
Inspection Dates:	December 15, 2017 and January 17, 2018, with continued in-office review to February 20, 2018
Exit Meeting Date:	February 27, 2018
Inspectors:	Ryan Craffey, Health Physicist Luis Nieves, Health Physicist
Approved By:	Aaron T. McCraw, Chief Materials Inspection Branch Division of Nuclear Materials Safety

Enclosure 2 contains Sensitive Unclassified
Non-Safeguards Information. When
separated from Enclosure 2, this enclosure
and its transmittal letter are decontrolled.

Enclosure 1

EXECUTIVE SUMMARY

**Acuren Inspection, Inc. ADBA/WIT Pipeline
NRC Inspection Report 03038913/2017005(DNMS)**

This was an unannounced, routine inspection of Acuren Inspection, Inc. ADBA WIT Pipeline (the licensee) authorized by the U.S. Nuclear Regulatory Commission (NRC) Materials License No. 22-27593-01 to possess and use radioactive material for industrial radiography and portable gauging purposes at numerous field stations and at temporary job sites throughout NRC jurisdiction. The scope of this inspection was limited to a review of the content and implementation of the licensee's radiation safety and security programs at field offices in Rochester, Hemlock, and Midland, Michigan.

The inspectors identified no violations of safety-related requirements during this inspection. However, the inspectors did identify an apparent violation of security-related requirements. Details of the apparent violation, including the corrective actions since taken to restore compliance with regulatory requirements, are discussed in the non-public Security Addendum to this inspection report.

REPORT DETAILS

1 Program Overview and Inspection History

Acuren Inspection, Inc. ADBA WIT Pipeline (the licensee) is a large non-destructive testing company authorized to use radioactive material for industrial radiography at numerous field stations and at temporary job sites throughout NRC jurisdiction.

Within the scope of this inspection, the licensee maintained a field office in Rochester, Michigan, where it stored numerous radiography cameras and tower scanning sources for use in a shielded vault on the premises (treated as a temporary job site) or for dispatch to other job sites in eastern Michigan and northwestern Ohio. The licensee also stored radiography cameras at a trailer on the premises of Hemlock Semiconductor Operations (HSO) in Hemlock, Michigan, and on the premises of Dow Corning in Midland, Michigan. The Rochester Operations Manager served as Site Radiation Safety Officer (RSO) for all three locations and oversaw approximately 45 radiographers and assistants in total.

The NRC last inspected the licensee on August 15, 2017 at the Corporate RSO's office in Duluth, Minnesota. As a result of this inspection, the NRC identified one SLIV violation for the failure to notify the agency of a reportable event in a timely fashion.

The NRC has also inspected the following field offices within the last year: Griffith, Indiana (May 19, 2017, no violations identified); Billings, Montana (April 27, 2017, one minor violation of security requirements); and Portage, Michigan (January 27, 2017, no violations identified).

2 Inspection of the Rochester Facility

2.1 Inspection Scope

On December 15, 2017, an inspector toured the licensee's field station in Rochester, interviewed staff involved with the radiation safety program, and reviewed a selection of related records.

2.2 Observations and Findings

The inspector interviewed the site RSO and several radiographers to discuss the storage, maintenance, and use of radiographic exposure equipment on the premises and at temporary job sites. The staff also demonstrated the conduct of radiographic operations within the shielded vault. Using a Canberra UltraRadiac calibrated on October 6, 2017, the inspector conducted independent surveys around the perimeter of the vault during this demonstration; no readings exceeded 0.05 millirem per hour.

The inspector also reviewed a selection of records for radiographer training, equipment maintenance including sealed source and depleted uranium leak testing, survey meter and dosimetry calibration, physical inventories, as well as utilization logs, shipping papers, and personnel dosimetry reports, which indicated maximum annual whole-body exposures to crews under the site RSO's supervision of 425 to 1624 millirem per year between 2014 and 2017.

2.3 Conclusions

The inspector did not identify any safety-related findings at the Rochester field station.

3 Inspection of the Hemlock Facility

3.1 Inspection Scope

On January 17, 2018, an inspector toured the licensee's field station on the premises of HSO in Hemlock, interviewed staff involved with the radiation safety program, and reviewed a selection of relevant records.

3.2 Observations and Findings

The inspector interviewed several radiographers to discuss the storage, maintenance, and use of radiographic exposure equipment on the premises. The staff demonstrated the implementation of licensee procedures for equipment maintenance and inspection, transportation of radioactive material, and the conduct of radiography at HSO.

The inspector also reviewed a selection of records for equipment maintenance including sealed source and depleted uranium leak testing, as well as utilization logs and shipping papers.

3.3 Conclusions

The inspector did not identify any safety-related findings at the Hemlock field station.

4 Inspection of the Midland Facility

4.1 Inspection Scope

On January 17, 2018, an inspector toured the licensee's field station on the premises of Dow Corning in Midland, interviewed staff involved with the radiation safety program, and reviewed a selection of relevant records.

4.2 Observations and Findings

The inspector interviewed several radiographers to discuss the storage, maintenance, and use of radiographic exposure equipment on the premises. The staff demonstrated the implementation of licensee procedures for equipment maintenance and inspection, transportation of radioactive material, and the conduct of radiography at Dow Corning.

The inspector also reviewed a selection of records for equipment maintenance including sealed source and depleted uranium leak testing, as well as utilization logs and shipping papers.

4.3 Conclusions

The inspector did not identify any safety-related findings at the Midland field station.

4 **Exit Meeting Summary**

The NRC inspector presented preliminary inspection findings following the onsite inspection on February 27, 2018. The licensee did not identify any documents or processes reviewed by the inspectors as proprietary. The licensee acknowledged the findings presented.

LIST OF PERSONNEL CONTACTED

Donald Batson – Radiographer
Jerry Caller – Radiographer
Don Flett – Operations Manager, Site RSO
Tim Gilliam – Radiographer
Bruce Karie – Corporate RSO
Mark Rinke – Division Manager

Additional radiographers and assistants at Rochester, Hemlock and Midland

Attended exit meeting on February 27, 2018.

INSPECTION PROCEDURES USED

87121: Industrial Radiography Programs