

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

1. LICENSEE/LOCATION INSPECTED: Verso Luke, LLC 300 Pratt Street Luke, Maryland 21540  REPORT NUMBER(S) 2018001		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) 03004525	4. LICENSE NUMBER(S) 19-00373-02	5. DATE(S) OF INSPECTION June 5, 2018, & July 30, 2018	

**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.

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

See attached

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)

**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	JEFFRY B. NEUBAUER	<i>Jeffrey B. Neubauer</i>	7/30/2018
NRC INSPECTOR	R. Ragland, Senior Health Physicist	<i>Randall S. Ragland</i>	7/30/2018
BRANCH CHIEF	ARTHUR L. BURRITT	<i>Arthur L. Burritt</i>	8/1/18

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(Continued)

Non-Cited Violation No. 1

10 CFR 20.1101(c) requires licensees to periodically, at least annually, review the radiation protection program content and implementation.

Contrary to the above, Verso Luke, LLC did not periodically, at least annually, review the radiation protection program content and implementation. Specifically, Verso Luke, LLC did not conduct annual reviews of the radiation protection program content and implementation for the years 2015 and 2016.

This violation occurred due to lack of oversight by an individual assigned responsibility for overseeing the fixed gauge program. Corrective actions included hiring a consultant who performed a radiation protection program review in 2017, and adding the requirement to perform an annual review of the radiation program to the plant's work scheduling program.

This violation was self-identified, corrected, and was not willful. Accordingly, this violation is classified as a SL IV Non-cited Violation (Section 6.7).

Non-Cited Violation No. 2

Condition 15, NRC License 19-00373-01, requires Verso Luke, LLC to conduct a physical inventory every six-months for all sealed sources and devices.

Contrary to the above, Verso Luke, LLC did not conduct physical inventories of all sealed sources and fixed gauges every six-months. Specifically, Verso Luke, LLC was required to perform a physical inventory on or before March of 2017, and did not conduct another fixed gauge inventory until February 2018, a period of approximately 11 months.

This violation occurred due to lack of oversight by an individual assigned responsibility for overseeing the fixed gauge program. Corrective actions included conducting a physical inventory of fixed gauges and including the requirement for 6-month fixed gauge inventories into the plant's work scheduling program.

This violation was self-identified, corrected, and was not willful. Accordingly, this violation is classified as a SL IV Non-cited Violation (Section 6.7).

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(Continued)

Non-Cited Violation No. 3

Condition 13, NRC License 19-00373-01, requires Verso Luke, LLC to conduct sealed source leak testing at intervals not exceeding the certificate of registration issued by the U.S. Nuclear Regulatory Commission under 10 CFR 32.210 or by an Agreement State. The Sealed Source and Device Registry No. TX-0634-D-884-B, issued by the Texas Department of State Health Services, for the Thermo Fisher Scientific (formerly Texas Nuclear) 5200 gauge, specifies a 36 month sealed source leak test frequency.

Contrary to the above, Verso Luke, LLC did not conduct sealed source leak testing at 36 month intervals as specified in Sealed Source and Device Registry (No. TX-0634-D884-B) issued by the State of Texas. Specifically, Verso Luke, LLC possessed at least 37 Thermo Fisher Scientific (formerly Texas Nuclear) 5200 gauges and did not leak test these gauges during the period from July 2013, to February 2018, a period of about four years and seven months

This violation occurred due to lack of oversight by an individual assigned responsibility for overseeing the fixed gauge program. Corrective actions included conducting required leak tests and including the gauge leak testing requirement in the plant's work scheduling program.

This violation was self-identified, corrected, and was not willful. Accordingly, this violation is classified as a SL IV Non-cited Violation (Section 6.7).