



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

August 13, 2019

Mindi Vrable, President & CEO  
Edge Management, LLC  
d/b/a Edge NDT Services  
566 East Maiden Street  
Suite 200  
Washington, PA 15301

**SUBJECT: EDGE MANAGEMENT, LLC, D/B/A EDGE NDT SERVICES - NRC  
INSPECTION NO. 15000037/2019001 AND NOTICE OF VIOLATION**

Dear Ms. Vrable:

This letter refers to the NRC inspection conducted on June 10, 2019, at a temporary job location at RDR Energy Services Fab Shop, located in Clarksburg, WV. This inspection examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with 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. The inspection continued in-office until August 2, 2019. We included in our review additional information related to your operating and emergency procedures and radiographer training program provided by your radiation safety officer in electronic mail dated June 21, 22, 25, and 29, 2019, and information you provided in our August 2, 2019, telephone exit meeting.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. These violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violations are cited in the enclosed Notice of Violation (Notice) because the violations were identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. 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 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 Web site 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.

If you have any questions regarding this matter, please contact Randolph Ragland of my staff at 610-337-5083 or via electronic mail at [Randolph.Ragland@nrc.gov](mailto:Randolph.Ragland@nrc.gov).

Thank you for your cooperation.

Sincerely,

**/RA/**

Anne DeFrancisco, Acting Chief  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

Docket No. 15000037  
License No. PA-1561

Enclosure:  
Notice of Violation

cc w/ enclosure  
Warren Shook, Radiation Safety Officer  
Commonwealth of Pennsylvania

EDGE MANAGEMENT, LLC, D/B/A EDGE NDT SERVICES - NRC INSPECTION NO.  
15000037/2019001 AND NOTICE OF VIOLATION DATED August 13, 2019

ML19231A010

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OFFICE	RI: DNMS	RI:DNMS			
NAME	RRagland/rcr	ADeFrancisco/aed			
DATE	08/13/19	08/13/19			

OFFICIAL RECORD COPY

## NOTICE OF VIOLATION

Edge Management, LLC  
d/b/a Edge NDT Services  
Washington, PA

Docket No. 15000037  
License No. PA-1561

During an NRC inspection conducted on June 10, 2019, and continued in-office until August 2, 2019, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A) 10 CFR 71.5(a) requires, in part, that each licensee who transports licensed materials outside the site of usage or where transport is on public highways, shall comply with the applicable requirements of the U.S. Department of Transportation regulations in 49 CFR Parts 170 through 189.

49 CFR 172.602(b) requires, in part, that emergency response information required by 49 CFR 172.602(a) must be available on shipping papers, or in a document, other than shipping papers, and (c) maintained in the same manner as prescribed for shipping papers.

49 CFR 177.817(e)(2)(i) requires that when the driver is at the vehicle's controls, the shipping paper shall be: (A) Within his immediate reach while he is restrained by the lap belt; and (B) either readily visible to a person entering the driver's compartment or in a holder which is mounted to the inside of the door on the driver's side of the vehicle.

Contrary to the above, on June 10, 2019, Edge Management, LLC dba Edge NDT Services, transported licensed material on public highways and did not maintain emergency response information required by 49 CFR 172.602(a), on shipping papers, or in a document other than shipping papers, in the same manner as prescribed for shipping papers. Specifically, the licensee maintained emergency response information required by 49 CFR 172.602(a) digitally on a phone which would not be readily accessible to a person entering the driver's compartment.

This is a Severity Level IV violation (Enforcement Policy Section 6.8).

- B) Condition 25 A, Amendment 8, Commonwealth of Pennsylvania, Department of Environmental Protection, Bureau of Radiation Protection, Radioactive Material License No. PA-1561, license application dated May 13, 2016, Step 7.71, Operating and Emergency Procedures, states that [following retraction of the source] "while approaching the exposure device with a calibrated survey instrument, read the radiation dose rate that is being registered on the meter face...and Perform a 360-degree or two-point survey at the front and side of the exposure device, the complete length of the source guide tube, the source tip and collimator."

Contrary to the above, on June 10, 2019, while conducting radiography activities at the RDR Energy Services Fab Shop, in Clarksburg, WV, Edge Management, LLC dba Edge NDT Services failed to conduct radiation surveys in accordance with their operating and emergency procedures, namely after retracting the source, they did not "while approaching the exposure device with a calibrated survey instrument, read the radiation dose rate that is being registered on the meter face...and perform a 360-degree or two-

point survey at the front and side of the exposure device, the complete length of the source guide tube, the source tip and collimator." Specifically, following retraction of the source, the assistant radiographer verified that radiation exposure rates dropped at the location of the remote control-assembly and that exposure rates at the rear corner of the exposure device matched pre-exposure survey results; but he did not read his survey meter while approaching the device and did not survey the length of the guide tube or source tip and collimator.

This is a Severity Level IV Violation (Section 6.7)

Pursuant to the provisions of 10 CFR 2.201, Edge NDT Services 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 13<sup>th</sup> day of August 2019