



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

February 4, 2020

Sharon Minchak, Vice President
Environmental Operations and Talent Management
Federal & Environmental Solutions
CH2M Hill, Inc.
4246 South Riverboat Road
Suite 210
Taylorsville, UT 84123

SUBJECT: NRC INSPECTION REPORT 030-39123/2019-001; AND NOTICE OF VIOLATION

Dear Ms. Minchak:

This letter refers to the announced initial inspection conducted on September 16, 2019, at your office in Taylorsville, Utah. The inspection was an examination of activities conducted under your license as they relate to public health and safety, and security of licensed materials, to confirm compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules, regulations, and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, and interviews with personnel.

The inspector discussed the preliminary inspection findings with Mr. Tony Mason, CHP, Radiation Safety Officer, at the conclusion of the onsite portion of the inspection. From September 19 to November 21, 2019, Mr. Mason provided additional requested information and records to the inspector. An in-office review of these records was performed by the NRC until December 18, 2019. A final exit briefing was conducted telephonically with you and Mr. Mason on January 21, 2020.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy which can be found at the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) because it was identified by the NRC during the inspection. The violation involved the failure to review radiation and contamination surveys for accuracy and completeness.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. The guidance in NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," may be helpful in preparing your response. You can find the Information Notice on the NRC website at: <https://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1996/in96028.html>. 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 (was) achieved should be addressed. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such information, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by Title 10 of the *Code of Federal Regulations* (CFR) 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Should you have any questions regarding this letter or the enclosed Notice, please contact Dr. Janine F. Katanic, CHP, at (817) 200-1151, or the undersigned at (817) 200-1455.

Sincerely,

/RA/

Patricia A. Silva, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

License No.: 43-35500-01
Docket No.: 030-39123

Enclosure:
Notice of Violation (Notice)

cc w/Enclosure:
Ty Howard, Director
Division of Waste Management and
Radiation Control
Utah Dept. of Environmental Quality
P.O. Box 144880
Salt Lake City, UT 84114-4880

NRC INSPECTION 030-39123/2019-001 - DATED February 1, 2020

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By: JFK

☒ Yes ☐ No☒ Publicly Available and non-sensitive

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NOTICE OF VIOLATION

CH2M Hill, Inc.
Taylorsville, Utah

Docket No.: 030-39123
License No.: 43-35500-01

During an NRC inspection conducted on September 16, 2019, with continuing in-office review through December 18, 2019, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 26 of NRC License 43-35500-01, Amendment 1, dated February 8, 2019, requires, in part, that the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in Application dated July 27, 2018. Application dated July 27, 2018, Attachment 4, CH2M Hill Procedure OP-001, Revision 1, "Radiological Surveys," Section 9.0, "Quality Assurance/Record Keeping," requires, in part, that radiation and contamination surveys will be reviewed by the Radiation Safety Officer or duly authorized representative for accuracy and completeness.

Contrary to the above, from April 16, 2019, to May 11, 2019, the licensee failed to conduct its program in accordance with the statements, representations, and procedures contained in Application dated July 27, 2018. Specifically, between April 16, 2019, and May 11, 2019, the licensee performed 44 radiation and contamination surveys at a temporary job site in U.S. Nuclear Regulatory Commission jurisdiction. The Radiation Safety Officer's documented review of the 44 radiation and contamination surveys failed to identify that all 44 records were not accurate. Inaccuracies in the radiation and contamination surveys records included incorrect information regarding instrument model, instrument probe model, instrument serial numbers, instrument calibration date, instrument sensitivities, and other errors.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.3.d).

Pursuant to the provisions of 10 CFR 2.201, CH2M Hill, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, 1600 E. Lamar Blvd., Arlington, Texas 76011, 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: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; 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 requiring information 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, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Enclosure

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management 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 or proprietary information so that it can be made available to the public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days of receipt.

Dated this 1st day of February 2020