



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

January 29, 2020

EA-18-131

Don B. Shumway, Jr., RSO
Prime NDT Services, Inc.
4345 Independence Drive
Schnecksville, PA 18078

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO STATUS OF
ACTIONS FOR CONFIRMATORY ORDER 03020982/2018002

Dear Mr. Shumway:

U.S. Nuclear Regulatory Commission (NRC) received the Prime NDT Services, Inc. letter dated October 28, 2019, in response to the NRC Confirmatory Order (Order) issued on April 1, 2019 (ML19091A106). In accordance with Item V.D.1 of the Order, you provided a summary discussing the performance issues that resulted in the violations associated with the Order, the actions taken by Prime NDT to address the performance issues and to enhance oversight and security of licensed material in transit, and the content of the Order.

This letter serves as the NRC's response pursuant to Item V.D.1.a of the Order requiring NRC review and comment concerning the summary. Please address the comments below. If desired, you may resubmit the document for additional NRC review and comment prior to submitting the summary to the external organizations listed in V.D.1 and V.D.2.

The NRC's comments are as follows:

- Remove all unique identifiers concerning vehicles, locations, individuals, radiography cameras, and sources to include but not limited to the following:
 - vehicle license plate number and VIN
 - names of all Prime NDT employees including the radiographer involved in the event, the supervisor, the technician who recovered the source, and name of the RSO
 - police officer's name and phone number
 - the address of the gas station and the specific location where the truck was recovered
 - the serial number of the radiography camera,
 - radioactive source model number, serial number, and activity
- Remove the "Physical Protection of Radioactive Material Training Program" from the summary.
- Remove the "Trustworthiness and Reliability Determination" form from the summary.
- Please move the paragraph discussing the trustworthiness and reliability reviews and the paragraph discussing the Confirmatory Order and completed actions to the discussion section on the current Page 2 of the summary.
- Please have an appropriate member of your organization proofread the summary for appropriate formatting, spelling, and grammar.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response (if any) will be available electronically for public inspection in the NRC's Public Document Room or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact me at (610) 337-5108.

Sincerely,

/RA/

Christopher Cahill, Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

Docket No. 030-20982
License No. 37-23370-01

U.S. NUCLEAR REGULATORY COMMISSION RESPONSE TO STATUS OF ACTIONS FOR
CONFIRMATORY ORDER 03020982/2018002 DATED January 29, 2020

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