



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

April 22, 2021

Mr. Brian Kruer, President
Hartford Quality Assurance, LLC
20 West 7th Street
New Albany, IN 47150

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03037549/2019001(DNMS) AND
NOTICE OF VIOLATION – HARTFORD QUALITY ASSURANCE

Dear Mr. Kruer:

On October 23, 2019, Mr. Ed Harvey, an inspector from the U.S. Nuclear Regulatory Commission (NRC), began a routine inspection at your facility in New Albany, Indiana. This inspection was completed, with in-office review through March 31, 2021, by Mr. Luis Nieves, another NRC inspector. The purpose of the inspection was to review activities performed under your NRC license to ensure that radiographic activities were being performed in accordance with NRC requirements. Mr. Nieves conducted a final exit meeting by telephone with you on March 31, 2021, to discuss the inspection findings. This letter 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, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. The violations were evaluated 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 violations concerned the licensee's failure to: (1) record pocket dosimetry readings at the beginning and end of each shift, as required by Title 10 of the *Code of Federal Regulations* (CFR) Part 34.47(b); and (2) maintain utilization logs required by 10 CFR 34.71(a) for a period of 3 years, as required by 10 CFR 34.71(b). These violations are cited in the enclosed Notice of Violation (Notice). The NRC is citing these violations in the enclosed Notice because the inspector identified the violations.

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 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>. You shall provide a root cause and corrective action for each violation in your response. The NRC will use your response, in part, to 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, its enclosure, and your response, will be made available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website 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 publicly available without redaction.

Please feel free to contact Mr. Nieves of my staff if you have any questions regarding this inspection. Mr. Nieves can be reached at 630-829-9571.

Sincerely,

Michael Kunowski, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 03037549
License No. 13-32671-01

Enclosure:
Notice of Violation

cc w/encl: State of Indiana

Letter to Brian Kruer from Michael Kunowski dated April 22, 2021.

SUBJECT: NRC ROUTINE INSPECTION REPORT NO. 03037549/2019001(DNMS) AND
NOTICE OF VIOLATION – HARTFORD QUALITY ASSURANCE

DISTRIBUTION

Jack Giessner
Kenneth O'Brien
David Pelton
Joseph Nick
Jamnes Cameron
Kenneth Lambert
Paul Pelke
MIB Inspectors

ADAMS Accession Number: ML21112A119

OFFICE	RIII DNMS	C	RIII DNMS	C	RIII DNMS	C	RIII EICS	C
NAME	LNieves:ps		EHarvey		MKunowski		JCameron	
DATE	4/21/2021		4/22/2021		4/22/2021		4/20/2021	

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Hartford Quality Assurance
New Albany, Indiana

License No. 13-32671-01
Docket No. 030-37549

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted on October 23, 2019, with continued in-office review through March 31, 2021, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. Title 10 of the *Code of Federal Regulations* (10 CFR) 34.47(b) states that direct reading dosimeters such as pocket dosimeters or electronic personal dosimeters, must be read and the exposures recorded at the beginning and end of each shift, and records must be maintained in accordance with § 34.83.

Contrary to the above, on May 17, 2019, a radiographer employed by the licensee did not record his direct reading dosimeter exposure at the beginning and end of the shift.

This is a Severity Level IV violation (Section 6.3).

- B. Title 10 CFR 34.71(a) states, in part, that each licensee shall maintain utilization logs showing, for each sealed source, the following information: (1) a description, including the make, model, and serial number of the radiographic exposure device or transport or storage container in which the sealed source is located; (2) the identity and signature of the radiographer to whom assigned; and (3) the plant or site where used and dates of use, including the dates removed and returned to storage.

Title 10 CFR 34.71(b) states that the licensee shall retain the logs required by paragraph (a) of this section for 3 years after the log is made.

Contrary to the above, on May 17, 2019, the licensee did not maintain utilization logs at its facility located in New Albany, Indiana, for 3 years after the logs were made. Specifically, the log for a sealed source used by a radiographer on that date was not maintained.

This is a Severity Level IV violation (Section 6.3).

Pursuant to the provisions of 10 CFR 2.201, Hartford Quality Assurance 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 III, 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 its 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 previously 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.

Enclosure

Your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the 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 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, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001.

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

Dated this 22nd day of April 2021.