



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

June 11, 2021

Mr. Cameron Schmidt, Deputy Director
Quality Assurance
Premier Technology, Inc.
1858 W. Bridge Street
Blackfoot, Idaho 83221

SUBJECT: NRC INSPECTION REPORT 030-36173/2021-001 AND NOTICE OF VIOLATION

Dear Mr. Schmidt:

This letter refers to the announced, routine inspection conducted on May 12, 2021, at your facility in Blackfoot, Idaho. The inspection examined activities conducted under your license as they relate to safety and security, to compliance with the U.S. Nuclear Regulatory Commission's (NRC) rules and regulations, and with the conditions of your license. Within these areas, the inspection consisted of an examination of selected procedures and representative records, observation of licensed facilities, independent radiation measurements, and interviews with personnel. A final exit briefing was conducted telephonically with you and Mr. Darrin Carter, Radiation Safety Officer, on June 7, 2021.

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 check alarm ratemeters for proper function before using at the start of each shift when performing industrial radiography activities.

The violation was discussed with you and Mr. Carter at the conclusion of the onsite portion of the inspection. You took immediate steps to implement corrective actions to address the violation and to prevent recurrence of the violation. Following the onsite inspection, you provided written correspondence to the NRC confirming the actions that were taken to correct the violation and prevent recurrence.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in electronic mail dated May 18, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML21152A131](#)). Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

During the inspection, the inspectors also reviewed the corrective actions that were taken to address a Severity Level IV violation that was cited in NRC Inspection Report 030-36173/2020-001, issued on May 29, 2020 (ADAMS Accession No. [ML20184A007](#)). The violation involved the failure to calibrate radiation survey instruments in accordance with the requirements in 10 CFR 34.25(b)(2). The inspectors reviewed this matter and found your corrective actions to be effective and lasting, and did not identify any recurrence of the violation. Accordingly, the violation is considered closed.

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, should you choose to provide one, 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,

Lizette Roldán-Otero, PhD, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket No. 030-36173
License No. 11-27746-01

Enclosure:
Notice of Violation (Notice)

cc:
Mark Dietrich
Radiation Control Program Director
Idaho Department of Environmental Quality
1410 North Hilton Drive
Boise, ID 83706

SUBJECT: NRC INSPECTION 030-36173/2021-001 AND NOTICE OF VIOLATION DATED
JUNE 11, 2021

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ADAMS ACCESSION NUMBER: **ML21161A347**

☒ SUNSI Review:

ADAMS:

By: JFK

☒ Yes ☐ No

☒ Publicly Available and non-sensitive

OFFICE	SHP:MIB	HP: MIB	C:MIB			
NAME	JFKatanic	ABBolger	LRoldanOtero			
SIGNATURE	/RA/	/RA/	/RA/			
DATE	6/3/2021	6/4/2021	6/10/2021			

OFFICAL RECORD COPY

NOTICE OF VIOLATION

Premier Technology, Inc.
Blackfoot, Idaho

Docket No. 030-36173
License No. 11-27746-01

During an NRC inspection conducted on May 12, 2021, one violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

10 CFR 34.47(g)(1) requires, in part, that each alarm ratemeter must be checked to ensure that the alarm functions properly (sounds) before using at the start of each shift.

Contrary to the above, between August 27, 2020, and May 12, 2021, the licensee failed to check each alarm ratemeter to ensure that the alarm functions properly (sounds) before using at the start of each shift. Specifically, between August 27, 2020, and May 12, 2021, the licensee performed radiographic operations on approximately 16 occasions using RA-500 alarm ratemeters and failed to ensure that the alarm functioned properly (sounds) before the start of each shift. The NDS Products' operating manual for RA-500 alarm ratemeters states "Check the battery and audio tone by pressing the push button at the arrow using a small diameter object such as a paper clip or jeweler's screwdriver. The red battery LED will light if the battery is ok and the alarm will sound." However, the licensee did not perform this action to ensure that the alarm would sound prior to the start of each shift conducting radiographic operations.

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

The NRC has concluded that 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 was achieved, is already adequately addressed on the docket in electronic mail dated May 18, 2021 (ML21152A131).

However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it 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 East Lamar Blvd., Arlington, Texas 76011-4511 within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, 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>. Therefore, to the extent possible, the response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

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

Dated this 11 of June 2021