

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED

Pole Brothers Imaging Company LLC
P. O. Box 1499
Sterling, VA 20167

2. NRC/REGIONAL OFFICE

Region 1
2100 Renaissance Blvd
Suite 100
King of Prussia, PA 19406-2713

REPORT NUMBER(S) 2021001

3. DOCKET NUMBER(S)

030-34342

4. LICENSE NUMBER(S)

45-25383-01

5. DATE(S) OF INSPECTION

07/01/2021 - 09/27/2021

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- ☐ 1. Based on the inspection findings, no violations were identified.
- ☐ 2. Previous violation(s) closed.
- ☐ 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, to exercise discretion, were satisfied.

Non-cited violation(s) were discussed involving the following requirement(s):

- ☒ 4. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited in accordance with the NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11. (Violations and Corrective Actions)

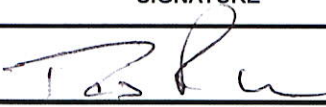
10 CFR 20.1502(a) requires, in part, that each licensee shall monitor exposures to radiation and radioactive material at levels sufficient to demonstrate compliance with the occupational dose limits in 10 CFR Part 20. As a minimum each licensee shall monitor occupational exposure to radiation from licensed and unlicensed radiation sources under the control of the licensee and shall supply and require the use of individual monitoring devices.

Contrary to the above, from at least November 15, 2019, through July 27, 2021, the licensee failed to monitor exposures to radiation and radioactive materials at levels sufficient to demonstrate compliance with 10 CFR Part 20. Specifically, the licensee (1) failed to store the dosimeter provider's control badge in an area of low background radiation, which in turn depressed the occupational exposure processing for licensee employees, and (2) failed to remove a plastic tab from the dosimeters, which resulted in occupational exposure results being reported by the third-party dosimetry provider as "unused," which was both unidentified and uncorrected by the licensee.

This was a Severity Level IV violation (Section 6.3.d). To correct this noncompliance, the licensee immediately relocated the control badge to a low background radiation area. Furthermore, the licensee contacted the third-party dosimetry provider to remove the control badge's effects from the applicable employee exposure reports.

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE'S REPRESENTATIVE	Charles "Tad Pole" Hilbert		9/28-2021
NRC INSPECTOR	Jason vonEhr	Jason E. VonEhr <small>Digitally signed by Jason E. VonEhr Date: 2021.09.27 13:51:09 -04'00'</small>	09/27/2021
BRANCH CHIEF	Christopher Cahill		