



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

December 6, 2021

Brian Fitzpatrick,
Corporate Director of Health & Safety
Haley & Aldrich, Inc.
100 Corporate Place
Suite 105
Rocky Hill, CT 06067-1803

**SUBJECT: HALEY & ALDRICH, INC. - NRC INSPECTION NO. 03031720/2021001 AND
NOTICE OF VIOLATION**

Dear Mr. Fitzpatrick:

This letter refers to the inspection conducted remotely on September 27, 2021, for your Rocky Hill, Connecticut facility *with a remote viewing of a* temporary job site location. This inspection examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel. Additional information was provided via BOX on October 7, 2021. An exit meeting was held by telephone on November 11, 2021.

Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements occurred. These violations were evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <https://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violations are cited in the enclosed Notice of Violation (Notice) because the violations were identified by the licensee but corrective actions were not timely nor comprehensive; additionally, violation B is repetitive from the prior routine inspection.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also 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 and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document 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, proprietary, or safeguards information so that it can be made available to the Public without redaction.

If you have any questions regarding this matter, please contact Jonathan Pfingsten of my staff at 610-337-5170 or via electronic mail at Jonathan.Pfingsten@nrc.gov.

B. Fitzpatrick

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Thank you for your cooperation.

Sincerely,

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

Docket No. 03031720
License No. 06-28529-01

Enclosure:
Notice of Violation

cc w/ enclosure
Ryan Beauregard, Radiation Safety Officer

HALEY & ALDRICH, INC. - NRC INSPECTION NO. 03031720/2021001 AND NOTICE OF VIOLATION DATED DECEMBER 6, 2021

DOCUMENT NAME: G:\WBL Documents\WBL Inspection Cover Letter\L06-28529-01.2021001.NOV.docx

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OFFICE	R1:DRSS	R1:DRSS			
NAME	JPfingsten	CCahill			
DATE	11/30/2021	12/6/2021			

OFFICIAL RECORD COPY

NOTICE OF VIOLATION

Haley & Aldrich, Inc.
Rocky Hill, CT

Docket No. 03031720
License No. 06-28529-01

During an NRC inspection conducted from September 27, 2021, through November 11, 2021, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

A) License Condition 12 of Amendment Number 11 for NRC License Number 06-28529-01 states that the Radiation Safety Officer for this license is Peter A. Falce.

Contrary to the above, from July 22, 2019, to September 17, 2021, the Radiation Safety Officer for this license was not Peter A. Falce. Specifically, from July 22, 2019, to October 1, 2020, the Radiation Safety Officer for this license was Brett Grunert. Additionally, from October 1, 2020, to the present, the Radiation Safety Officer for this license has been Ryan Beauregard. As corrective action, the licensee submitted a license amendment request on August 19, 2021, to name Mr. Beauregard as the Radiation Safety Officer. This was approved in Amendment Number 12 for NRC License Number 06-28529-01 issued on September 17, 2021.

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

B) 10 CFR 20.1101(c) requires that the licensee shall periodically (at least annually) review the radiation protection program content and implementation.

Contrary to the above, the licensee failed to periodically (at least annually) review the radiation protection program content and implementation. Specifically, the licensee conducted an annual program review on December 4, 2019, and then performed the following annual program review on January 4, 2021, a period greater than one year. This is a repetitive violation from the prior NRC inspection.

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

Pursuant to the provisions of 10 CFR 2.201, Haley & Aldrich, Inc. is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, 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 for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, 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 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 to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response

which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publicly available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

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

Dated This 6 day of December 2021