

NRC FORM 591M PART 1  
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

## SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:  Hawaii Geotechnical Consulting, Inc. A Storage Inn, 285 Hoohana Street Kahului, Hawaii		2. NRC/REGIONAL OFFICE  U.S. Nuclear Regulatory Commission Region IV, 1600 East Lamar Blvd Arlington, Texas 76011-4511	
REPORT NO.: 2021-001			
3. DOCKET NUMBER  030-36710	4. LICENSE NUMBER  53-27791-01	5. DATES OF INSPECTION  September 28 – November 10, 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 violations closed.
- ☐ 3. The violations, 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 was/were discussed involving the following requirement(s) and Corrective Action(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. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

- A) License Condition 13 of NRC License 53-27791-01 requires, in part, that sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration, and that records of leak tests shall be maintained for 3 years.

Contrary to the above, from October 2017 to October 2021, the licensee failed to ensure sealed sources were tested for leakage and/or contamination at the intervals specified in the certificate of registration or maintain records of leak tests for 3 years.

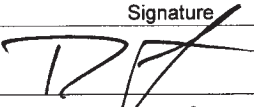
Specifically, annual leak tests for the licensee's 4 portable gauges were either not performed or missing records of the tests. The licensee corrected this by immediately leak testing all 4 gauges which demonstrated all the sources were still sealed. To prevent recurrence, the licensee has entered a reminder in a calendar to assist in conducting annual leak tests and will keep the test records for at least 3 years.

This is a Severity Level IV violation (Section 6.7.d.4)

Continued on 591M Part 2

## Licensee's Statement of Corrective Actions for Item 4, above.

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	Robert M. Gibbens, P.E.		11/10/2021
NRC INSPECTOR	Jason Dykert	Jason C. Dykert	Digitally signed by Jason C. Dykert Date: 2021.11.10 07:57:43 -07'00'
BRANCH CHIEF	Lizette Roldán-Otero, Ph.D.	Lizette Roldan-Otero	Digitally signed by Lizette Roldan-Otero Date: 2022.01.05 08:04:36 -06'00'

## SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

## 1. LICENSEE/LOCATION INSPECTED:

Hawaii Geotechnical Consulting, Inc.  
A Storage Inn, 285 Hoohana Street  
Kahului, Hawaii

REPORT NO.: 2021-001

## 2. NRC/REGIONAL OFFICE

U.S. Nuclear Regulatory Commission  
Region IV, 1600 East Lamar Blvd  
Arlington, Texas 76011-4511

## 3. DOCKET NUMBER

030-36710

## 4. LICENSE NUMBER

53-27791-01

## 5. DATE(S) OF INSPECTION

September 28 – November 10, 2021

## CONTINUED FROM PART 1

- B. License Condition 22 of NRC License 53-27791-01 requires, in part, that the licensee shall conduct its program in accordance with the license application dated October 28, 2015. The license application states, in part, that the licensee will maintain the operating and emergency (O&E) procedures in Appendix H of NUREG-1556, Vol. 1, Rev. 1. The O&E procedures state that the licensee will "Sign out the gauge in a log book (that remains at the storage location) including the date(s) of use, name(s) of the authorized users who will be responsible for the gauge, and the temporary job site(s) where the gauge will be used."

Contrary to the above, from December 2015 to present, the licensee failed to "Sign out the gauge in a log book (that remains at the storage location) including the date(s) of use, name(s) of the authorized users who will be responsible for the gauge, and the temporary job site(s) where the gauge will be used."

Specifically, the licensee did not maintain any utilization logs until this inspection. The licensee corrected this by keeping utilization logs and recording the required information listed above. To prevent recurrence a utilization log will be maintained whenever the portable gauges are used.

This is a Severity Level IV violation (Section 6.3.d.3)

- C. License Condition 21 of NRC License 53-27791-01 requires, in part, that the licensee store records required by the Commission at the licensee's corporate office located at 1055 Aina Manu Place, Makawao, Hawaii.

Contrary to the above, since June 2016, the licensee failed to store records required by the Commission at the licensee's corporate office located at 1055 Aina Manu Place, Makawao, Hawaii.

Specifically, the licensee moved the corporate office location but failed to update the address on the license with where the records required by the Commission are stored. The licensee corrected this by submitting a license amendment request on November 4, 2021, with a new address where records are stored. To prevent recurrence, the licensee will submit a license amendment request, to update the office address, prior to changing the address where records are stored.

This is a Severity Level IV violation (Section 6.3)

## Dykert, Jason

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**From:** Dykert, Jason  
**Sent:** Wednesday, November 10, 2021 8:06 AM  
**To:** r r  
**Subject:** NRC inspection report 2021-001  
**Attachments:** Hawaii Geotechnical 591M, 2021-001.pdf

Good morning Robert,

As we discussed I have attached the inspection report – please review the corrective actions that are written down, and make sure you understand and can accomplish them. Then sign the report and email it back to me.

After my Branch Chief reviews and signs the report, I will make it a publicly available safety record for review in the NRC's Agencywide Documents Access and Management System ([ADAMS](#)) online database.

Give me a call with any questions or concerns.

Jason Dykert  
Health Physicist  
Division of Nuclear Materials Safety  
US NRC Region IV

Phone: 817-200-1427