

some 200 occasions between April 9, 2009, and November 18, 2015, in violation of 10 CFR 150.20, *Recognition of Agreement State Licenses*. The agency further concluded that a former EMSI radiation safety officer and operations manager contributed to the seriousness of the violations by exhibiting “careless disregard” for NRC requirements when he failed to ascertain whether the firm was licensed to perform work at job sites in Washington, D.C., and “an area of exclusive federal jurisdiction within the Commonwealth of Virginia.”

The NRC grouped the violations as a Severity Level III problem, and doubled the \$7,000 base civil penalty for such violations in large part because of their “willful” nature. The company was given 30 days to protest the agency’s decision or to pay the fine.

Other Severity Level III violation notices

issued recently by the NRC (but without civil penalty proposals, due to mitigating factors) include the following:

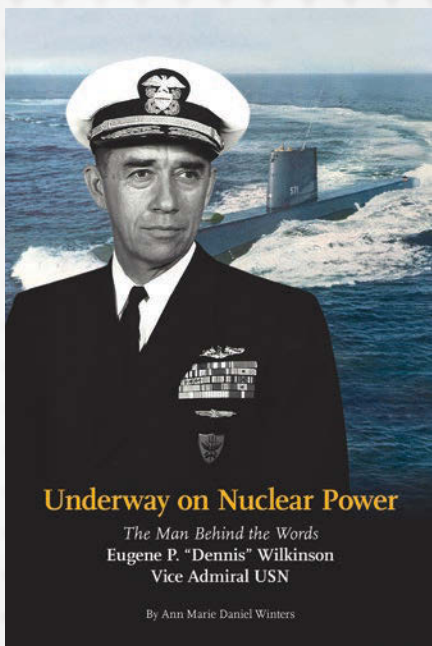
■ On December 2, the NRC issued a notice to New Albany, Ind.-based Hartford Quality Assurance, a provider of testing services, for three violations of NRC requirements, including a June 2016 failure of an individual to wear a direct reading dosimeter, an operating alarm rate meter, and a personnel dosimeter at all times during radiographic operations, as required by 10 CFR 34.47, *Personnel Monitoring*. Two security-related violations were also issued, but the NRC typically does not provide details to the public on violations involving security-related matters.

■ On December 7, Lehigh Cement Company’s Mitchell, Ind., facility was issued a notice for failing to have an individual named on its NRC license as radiation

safety officer. According to the notice, the RSO listed on Lehigh’s license left the firm’s employ in November 2014, leaving no one listed as RSO until June 2016.

■ On December 15, the NRC issued a notice to Romeo RIM Inc., a manufacturer of reaction injection molding composite components in Romeo, Mich., for the improper transfer of a fixed gauge containing cesium-137. According to the letter accompanying the NRC’s notice, the loss of “institutional knowledge” at the firm resulted in the gauge’s being “unknowingly disposed of as scrap during the decommissioning of a manufacturing work center.” Further, “the gauge was not tested as required for leakage or proper operation of the on-off mechanism,” the NRC said. “Following retirement of the last known responsible individual, a new individual was not appointed to the position.” **N**

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