



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

REGIONAL TECHNICAL ASSISTANCE REQUEST FORM

Date: October 11, 2000

Mail and E-Mail to: Donald A. Cool, Ph.D. (DAC), Director
Division of Industrial and Medical Nuclear Safety , NMSS
For E-Mail, cc: IMNS Secretary

From: Dwight D. Chamberlain, Director *[Signature]*
Division of Nuclear Materials Safety, RIV

Licensee: Accurate NDE & Inspection, LLC
Louisiana License LA-10207-L01

Control Number: N/A (if applicable)

Letter dated: September 18, 2000

Enforcement Action being held in abeyance: () Yes (X) No

Suggested change in licensing procedure (enclosed): None

Problem/Issue:

By letter dated September 18, 2000, Accurate NDE & Inspection, LLC (Accurate), is requesting an exemption from the requirements specified in 10 CFR 34.20 for the use of various pipeliner devices in NRC jurisdiction.

Accurate has requested an exemption from the requirements specified in 10 CFR 34.20 for the use of SPEC Model SPECK-CHECK II and Gamma Industries Model Pipeliner 1 exposure devices. Accurate proposes to use licensed material in NRC jurisdiction under the authority of a general license pursuant to 10 CFR 150.20, and accordingly has filed with Region IV in accordance with 10 CFR 150.20(b) (copy of NRC Form 241 dated 08/17/00 enclosed). 10 CFR 150.20(b) requires general licensees to comply with the requirements of Subparts C through H of Part 34 in addition to other regulations.

Section 34.20 of 10 CFR Part 34 states, in part, that each radiographic exposure device, source assembly or sealed source, and all associated equipment must meet the requirements specified in American National Standards Institute, N432-1980 "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography." The aforementioned exposure devices do

not meet these requirements. The exemption request was submitted due to the unique capabilities of the devices and the unavailability of other exposure devices to perform the needed inspection of pipeline construction. Accurate's justifications for requesting an exemption for use of these devices are described in the attached documents.

As a reason for requesting an exemption, Accurate also cited concerns over the safety of using alternate devices not intended for the inspection of pipeline construction.

The State of Louisiana Department of Environmental Quality has granted this licensee an exemption to use these devices throughout the State of Louisiana, in areas not under exclusive Federal jurisdiction (copy of Louisiana Radioactive Material License enclosed).

Action Requested:

Determine if the request for an exemption from the requirements specified in 10 CFR 34.20 may be granted for use of the SPEC Model SPECK-CHECK II and Gamma Industries Model Pipeliner 1 exposure devices in accordance with 10 CFR 34.111

Recommended Action and Alternatives: (X) Approve or () Reject

TARs addressing similar issues (subject and date):

TARs dated March 16, 1999, and January 26, 2000. Subject: requests for an exemption from 10 CFR 34.20 submitted by Global X-Ray & Testing Corporation; X-Ray Inspection, Inc.; Stolt Comex Seaway, Inc.; and Gulf Coast International Inspection, Inc.

Background documents (identify those not sent electronically):

- Memorandum dated August 20, 1998, from William H. Spell, Administrator, Radiation Protection Division Department of Environmental Quality, State of Louisiana
- Environmental Assessment, Finding of No Significant Impact, and Notice of Opportunity for a Hearing, dated August 15, 2000, for Gulf Coast International Inspection, Inc., Louisiana License LA-7396-L01.
- NRC Form 241 dated 08/17/00 and Louisiana Radioactive Material License #LA-10207-L01, Amendment Nos. 3 and 4.

Remarks:

This exemption request was prompted by a memorandum (copy enclosed) dated August 20, 1998, from William H. Spell, Administrator, Radiation Protection Division, Department of Environmental Quality, State of Louisiana, to Louisiana Industrial Radiography and Well Logging Licensees. The subject of the August 20, 1998, memorandum is Performing Licensed Activities in Areas of NRC Jurisdiction Including Non-Agreement States, Federal Facilities, and in Off-Shore Waters. The memorandum includes information on the requirements of 10 CFR 34.20 and the need for

Louisiana licensees using equipment that does not meet §34.20 requirements to file an exemption request with the NRC in accordance with 10 CFR 34.111 in order to continue to work within NRC jurisdiction.

Headquarter Reviewer: _____

Regional Reviewer: Christi Hernandez

Reviewer Code: T2

Reviewer Phone Number: (817) 860-8217 FAX Number: (817) 860-8263

Request Needed by: ASAP

Distribution:

EWMerschoff, RA
 TPGwynn, DRA
 DDChamberlain, D/DNMS
 CLCain, C/NMLB
 MRShaffer, C/NMIB
 MCHernandez, NMLB
 RALeonardi, NMIB
 MLMcLean, SAO
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 NMLB Reading File

DOCUMENT NAME: G:\DNMS\NMLB\Accurate3420.TAR.wpd

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RIV:NMLB	C:NMLB	D:DNMS					
MCHernandez	CLCain	DDChamberlain					
10/6/00	10/10/00	10/11/00					

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ADAMS # _____
Template _____
Date ___/___/___ **QC'd by** _____



State of Louisiana
Department of Environmental and Natural Resources

Post-it Fax Note	7671	Date	8/20	# of pages	4
To	Chas. Hackney		From	Bill Spell	
Co./Dept.			Co.		
Phone #	P/NIS		Phone #		
Fax #			Fax #		

M.J. "MIKE" FOSTER, JR.
GOVERNOR

August 20

SECRETARY

MEMORANDUM

To: Louisiana Industrial Radiography and Well Logging Licensees

From: William H. Spell, Administrator
Radiation Protection Division

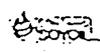
SUBJECT: PERFORMING LICENSED ACTIVITIES IN AREAS OF NRC JURISDICTION, INCLUDING NON-AGREEMENT STATES, FEDERAL FACILITIES, AND IN OFF-SHORE WATERS

The Nuclear Regulatory Commission (NRC) has informed the Radiation Protection Division that Louisiana licensees intending to perform licensed activities under reciprocity in areas under NRC jurisdiction are responsible for satisfying the requirements in 10 CFR 150.20 (Enclosure 1). Louisiana licensees may accomplish this objective by either of the following methods:

1. Filing with NRC a "Report of Proposed Activities in Non-Agreement States" [reference 10 CFR 150.20(b)(1)] to operate under an NRC General License.

Louisiana licensees shall, at least 3 days prior to engaging in any activities for the first time in any calendar year, file a submittal containing four copies of NRC Form-241 (revised), "Report of Proposed Activities in Non-Agreement States," and four copies of its Louisiana specific license with the NRC's Region IV Administrator. In addition, the licensee must submit the fee specified in fee Category 16, 10 CFR 170.31 (Enclosure 2).

NRC must receive this filing at least 3 days before the licensee engages in activities permitted under the general license established by 10 CFR 150.20, unless the three-day requirement is waived by the Regional Administrator, as provided by 10 CFR 150.20(b)(1). This general license authorizes persons holding a specific license from an Agreement State to conduct the same activity in areas of exclusive Federal jurisdiction, in non-Agreement States, or in offshore waters, if the specific license issued by an Agreement



August 20, 1998.

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State does not limit the authorized activity to a specific installation or location. "Offshore waters" is defined in 10 CFR 150.3 as "that area of land and water, beyond Agreement States' Submerged Lands Act jurisdiction, on or above the U.S. Outer Continental Shelf."

OR,

2. Louisiana licensees intending to engage in activities in offshore waters and beyond the three mile limit, off the coast of Louisiana and under the NRC general license may, in lieu of notifying the NRC as described above, notify the Radiation Protection Division, State of Louisiana, about the activities to be performed at least 3 days before engaging in such activities [(reference 10 CFR 150.20(c)]. At this time, the Radiation Protection Division does not have authority to waive the 3-day notification requirement.

Notification to the State of Louisiana shall include the following:

- a description of the activity,
- the location,
- the dates scheduled,
- a list of the sealed sources, and devices containing sealed sources, which will be possessed, used, installed, serviced, or tested,
- a description of the type and quantity of radioactive material contained in each sealed source or device,
- the name of a licensee contact, and how that person may be reached.

Please note that only reciprocity activities conducted in offshore waters are not subject to the 180-day limitation normally associated with licensed activities conducted under reciprocity in other NRC or some state jurisdictions. Notwithstanding any provisions to the contrary in any specific license issued by the State of Louisiana, licensees engaging in activities in NRC jurisdiction are required to comply with all applicable NRC regulations.

For Louisiana licensees performing industrial radiography operations in areas under NRC jurisdiction, the licensee must ensure that the radiography equipment being used meets the requirements of 10 CFR Part 34.20, regardless of any exemption previously or hereafter granted by the State of Louisiana.

August 20, 1998

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NRC's regulation 10 CFR 34.20 (same as our LAC 33:XV:550) requires that all radiography equipment must meet specific design requirements. Licensees may only use equipment that meets these requirements when performing licensed activities in areas under NRC jurisdiction. It should be noted that several different models of pipeliner-type devices do not meet the requirements of 10 CFR 34.20.

If a licensee intends to use equipment that does not meet the requirements of 10 CFR 34.20, then that licensee must file with NRC, in accordance with 10 CFR 34.111 (previously 34.51 and same as our LAC 33:XV.103.A), a request for an exemption to use the equipment, and receive NRC approval before commencing use of a device not approved by NRC in offshore waters under NRC jurisdiction.

The NRC requires licensees to request such exemptions, even if an exemption for use of the equipment in Louisiana jurisdiction has been granted by this state. However, in order not to disrupt ongoing, or planned near-term, offshore operations, NRC will not take enforcement action against licensees for performing activities with such equipment, provided that (1) the licensee has already received an exemption from the State of Louisiana, and (2) the licensee submits a request to the NRC for exemption, within 30 days of the date of this letter, which includes documentation of the Louisiana exemption approval. The NRC will continue to refrain from taking enforcement action regarding the use of the equipment until NRC makes a final determination on the exemption request.

To facilitate the NRC review in these cases, a licensee should include a copy of the exemption request and supporting information that was submitted to Louisiana, and a copy of the subsequent licensing action issued by Louisiana. Licensees should note that Louisiana's approval of the exemption request does not guarantee that NRC will grant a similar exemption and that economic benefit to the licensee will not alone suffice as justification for an exemption. The licensee must demonstrate that the engineered safety features, use limitations, and procedures would compensate for not meeting the regulatory requirements and afford similar or increased radiation safety protection. Any denial of an exemption request by NRC will be coordinated with the State of Louisiana.

Requests for exemption should be submitted to:

U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064
ATTN: Regional Administrator

August 20, 1998
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Licenses should note that failure to meet reciprocity requirements and/or performance of radiography with equipment that does not meet 10 CFR 34.20 in areas under NRC jurisdiction are violations of NRC regulations. However, based on apparent confusion in the past regarding reciprocity requirements and more recent equipment requirements for Louisiana licensees performing work in offshore waters under NRC jurisdiction, the NRC is exercising enforcement discretion pursuant to Section VII.B.6. of the NRC Enforcement Policy and will not consider enforcement actions for violations for offshore activities occurring prior to the date of this letter. Furthermore, as detailed above, NRC will not take enforcement action regarding the performance of industrial radiography with equipment that does not meet 10 CFR 34.20 provided that certain conditions are met, as described above and below:

For activities occurring in offshore waters in areas where NRC has jurisdiction, NRC has informed the state that it intends to take enforcement action after the date of this letter for failure to meet reciprocity regulations and failure to use equipment that complies with regulations found in 10 CFR 34.20 if the exemption process described above is not met or if the exemption has been denied. Noncompliance with NRC regulatory requirements may result in the NRC's exercising its civil enforcement authority, which could include the assessment of civil penalties or the issuance of orders for the revocation or suspension of an NRC-specific or general license (which granted reciprocity). Willful violations may result in civil or criminal sanctions to NRC licensees and/or their employees.

If you have any questions concerning this letter, please contact Dr. James Sanford or Mr. Michael Henry, program managers, at (504) 765-0160.

whs

Enclosures (as stated)

C: NRC Administrator, Region IV
NRC Office of State Programs



COPY
7590-01-P

NUCLEAR REGULATORY COMMISSION

[Louisiana License LA-7396-L01]

Gulf Coast International Inspection, Inc.-- Houma, LA

Environmental Assessment, Finding of No Significant Impact, and
Notice of Opportunity for a Hearing.

The U. S. Nuclear Regulatory Commission is considering authorizing Gulf Coast International Inspection, Inc. (Gulf Coast) an exemption to use pipeliners on lay barges in the Gulf of Mexico.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action

Gulf Coast International Inspection Incorporated (Gulf Coast) is licensed by the State of Louisiana to conduct industrial radiography operations. They have requested, in their letter dated November 16, 1999, that the United States Nuclear Regulatory Commission (NRC) grant them reciprocity and an exemption from 10 CFR 34.20 (a)(1) to use their pipeliner type radiography cameras (pipeliners) for pipeline radiography on lay barges in areas under exclusive federal jurisdiction in the Gulf of Mexico. Pipeliners are older model radiography cameras that do not meet the requirements of 10 CFR 34.20(a)(1) which requires equipment used in industrial radiographic operations to meet the requirements in ANSI N432-1980, "Radiological Safety for the Design and Construction of Apparatus for Gamma Radiography (ANSI N432-1980)," (published as NBS Handbook 136, issued January 1981). Gulf Coast is allowed to conduct similar operations in the State of Louisiana under an exemption granted in license number LA-7396-L01.

Need for the Proposed Action

The exemption is needed so that Gulf Coast can carry out its business of pipeline radiography on lay barges for the continuation of pipeline operations in the oil and gas industry. Gulf Coast contends that due to the design of the lay barges and the limited space that is available, the pipeliner is the only device that will keep up with production on a lay barge and provide a safe working environment for their radiographers and surrounding barge personnel.

Environmental Impacts of the Proposed Action

There will be no significant environmental impact from the proposed action due to the fact that no material is being released into the environment and all of the material is wholly contained within the radiography camera which is only used in a fully enclosed radiography stall on a lay barge. During normal operation the radiation dose will not be significantly greater than an approved radiography camera's normal operating external radiation dose levels.

Alternatives to the Proposed Action

As required by Section 102(2)(E) of NEPA (42 USC 4322(2)(E)), possible alternatives to the final action have been considered. The only alternative is to deny the exemption. This option was not considered practical because there would be no gain in protecting the human environment. Denying the exemption request would force Gulf Coast to revert to radiography cameras that are designed to meet ANSI N432-1980, but these cameras are not practical for radiography operations on a lay barge. These newer cameras would be similar to the pipeliners in that their radioactive material is housed as a sealed source and there would be no release of material to the environment. However, these newer cameras have associated equipment, such as a drive cable and guide tube, that would require additional space to perform radiography on pipelines. This equipment becomes cumbersome and may get in the way as the pipe is moved through the lay barge. In the newer devices, the sealed source would have to be cranked out of

the shielded position in the camera housing through a guide tube to the exposure head location where the radiograph takes place. This "crank out" action causes the source to be unshielded while the source is cranked out to the exposure head. This results in an increase in the "restricted area" boundary causing a greater potential for non-radiography personnel on the lay barge to become exposed to radiation.

Alternative Use of Resources

No alternative use of resources was considered due to the reasons stated above.

Agencies and Persons Consulted

The State of Louisiana was contacted by telephone on August 7, 2000 regarding this proposed action. The State of Louisiana is in agreement with the proposed action and had no additional comments.

Identification of Sources Used

Letter from Gulf Coast International Inspection, Inc. to U.S. Nuclear Regulatory Commission, Region IV, Re: Louisiana License No. LA-7396-L01, dated November 16, 1999.

FINDING OF NO SIGNIFICANT IMPACT

Based on the above environmental assessment, the Commission has concluded that environmental impacts that would be created by the proposed action would not have a significant effect on the quality of the human environment and does not warrant the preparation of an Environmental Impact Statement. Accordingly, it has been determined that a Finding of No Significant Impact is appropriate.

Gulf Coast's application is available for inspection and copying for a fee in the Region IV Public Document Room, 611 Ryan Plaza Drive, Suite 400, Arlington, TX 76011-8064. The documents may also be viewed in the Agency-wide Documents Access and Management System (ADAMS) located on the NRC website at www.nrc.gov.

OPPORTUNITY FOR A HEARING

Any person whose interest may be affected by the issuance of this action may file a request for a hearing. Any request for hearing must be filed with the Office of the Secretary, U.S. Nuclear Regulatory Commission, Washington, DC 20555, within 30 days of the publication of this notice in the Federal Register; be served on the NRC staff (Executive Director for Operations, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852), and on the licensee (Gulf Coast International Inspection, Inc., 227 Clendenning Road, Houma, LA 70363); and must comply with the requirements for requesting a hearing set forth in the Commission's regulations, 10 CFR Part 2, Subpart L, "Information Hearing Procedures for Adjudications in Materials Licensing Proceedings."

These requirements, which the request must address in detail, are:

1. The interest of the requestor in the proceeding;
2. How that interest may be affected by the results of the proceeding (including the reasons why the requestor should be permitted a hearing);
3. The requestor's areas of concern about the licensing activity that is the subject matter of the proceeding; and
4. The circumstances establishing that the request for hearing is timely -- that is, filed within 30 days of the date of this notice.

In addressing how the requestor's interest may be affected by the proceeding, the request should describe the nature of the requestor's right under the Atomic Energy Act of 1954, as amended, to be made a party to the proceeding; the nature and extent of the requestor's property, financial, or other (i.e., health, safety) interest in the proceeding; and the possible effect of any order that may be entered in the proceeding upon the requestor's interest.

Dated at Rockville, Maryland, this 15th day of August, 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

John W. N. Hickey, Chief
Material Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety,
Office of Nuclear Material Safety and Safeguards

P. O. Box 1298
Opelousas, LA 70571-1298



Phone: 337-948-7170
Fax : 337-948-7176

& INSPECTION L. L. C.

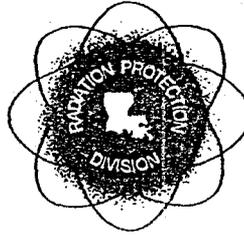
Attachment 1A

Customer List:

**Walter Oil & Gas, Inc.
Basin Exploration, Inc.
Tri-Union, Inc.
Spirit Energy/ Unocal
Newfield Exploration, Inc.**

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF AIR QUALITY AND RADIATION PROTECTION

RADIOACTIVE



MATERIAL LICENSE

LOUISIANA RADIATION PROTECTION DIVISION
P.O. BOX 2135
BATON ROUGE, LOUISIANA 70884-2135

Pursuant to the Louisiana Environmental Quality Act (Louisiana Revised Statutes 30:2101 et seq.) and the Louisiana Radiation Regulations, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, own, possess and transfer radioactive material for the purpose(s) and at the place(s) designated below. This license shall be deemed to contain the conditions specified in the Louisiana Revised Statutes 30:2105 of the Louisiana Nuclear Energy and Radiation Control Law, and is subject to all applicable rules, regulations, and orders of the Louisiana Radiation Protection Division now or hereinafter in effect, including the Louisiana Radiation Regulations (LAC 33:XV) and to any condition specified in the license.

LICENSEE Accurate NDE & Inspection, LLC 8849 Highway 182 Opelousas, Louisiana 70570 Attention: Roy Richard Radiation Safety Officer	LICENSE NUMBER LA-10207-L01	EXPIRATION DATE March 31, 2002
	AMENDMENT NUMBER 3	PREVIOUS AMENDMENTS ARE VOID
	THIS LICENSE ISSUED PURSUANT TO AND IN ACCORDANCE WITH Letter SIGNED BY: Roy Richard DATE: June 12, 2000	

RADIOISOTOPE		MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY * OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION	STORAGE CONTAINER OR EXPOSURE DEVICE	
ELEMENT	MASS NO.			CHEMICAL FORM - PHYSICAL STATE	AUTHORIZED USE	
Ir	192	Any	120 Ci	Industrial Nuclear Co. Models 32 and 33; Amersham Models 87703 or 87704; SPEC Models G-40F or G40T	Industrial Nuclear Company Model IR-100	Industrial Radiography
Ir	192	Any	100 Ci	Amersham Models A424-9, A424-22 or 91813; RTS Model 702; SPEC Models T-5, T-5F, or T-7F	Amersham Model 660 System	Industrial Radiography
Ir	192	Any	150 Ci	SPEC Model G-60	SPEC Model 150	Industrial Radiography

The source exchange and storage devices listed below are authorized for use in accordance with the licensee's radiological Operating and Emergency Procedures:

Industrial Nuclear Source
Model IR-50
Exchange and Storage

* pCi- picocurie; μCi- Microcurie; mCi- Millicurie; Ci- Curie

	Bliss M. Higgins Assistant Secretary	DATE June 29, 2000	PAGE OF 1	PAGES 4
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DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES
PERMITS DIVISION
BATON ROUGE, LOUISIANA 70884-2135

LICENSEE Accurate NDE & Inspection, LLC	LICENSE NUMBER LA-10207-L01	AMENDMENT NO. 3	EXPIRATION DATE March 31, 2002
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RADIOISOTOPE ELEMENT	MASS NO.	MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION CHEMICAL FORM--PHYSICAL STATE	STORAGE CONTAINER OR EXPOSURE DEVICE	AUTHORIZED USE
					SPEC Model C-1	Source Exchange and Storage
					Amersham Models 500-SU, 650L, 820 and 855	Source Exchange and Storage

1. A. Radioactive material shall be stored at Accurate NDE and Inspection, LLC, 146 Des Jaques Road, Lafayette, Louisiana and Accurate NDE and Inspection, LLC, 3314 Curtis Lane, New Iberia, Louisiana.
- B. Radioactive material shall be used only at temporary jobsites of the licensee, in areas not under exclusive Federal jurisdiction, throughout the State of Louisiana. Prior to operation at temporary jobsites, the licensee shall comply with applicable provisions of other regulations of the Department of Environmental Quality, and obtain all applicable state and local permits.
- C. This condition does not prohibit use in other Agreement States and states under the jurisdiction of the U.S. Nuclear Regulatory Commission under reciprocity procedures which may be established by an Agreement State or the U.S. Nuclear Regulatory Commission.
2. The Radiation Safety Officer for this license is Roy Richard.
3. This license does not authorize underwater radiography.
4. Pursuant to LAC 33:XV.575.A., the licensee may permit an individual to act as a radiographer provided:
 - A. Verification of satisfactory completion has been received from a person approved by the Department, an Agreement State, or the Nuclear Regulatory Commission to conduct a radiography training program which meets the requirements equivalent to LAC 33:XV.575.A.1. If verification cannot be received, then the licensee may accept verification from the holder of a license issued by the Department, an Agreement State or the Nuclear Regulatory Commission that the individual has been employed as a radiographer as defined by LAC 33:XV.503; and
 - B. The individual has received instruction and training which meets the requirements of LAC 33:XV.575.A.2 and 3 as specified in the licensee's Operating and Emergency Procedures; and

*µCi-microcurie; mCi-millicurie; Ci-Curie

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES
PERMITS DIVISION
BATON ROUGE, LOUISIANA 70884-2135

LICENSEE Accurate NDE & Inspection, LLC		LICENSE NUMBER LA-10207-L01	AMENDMENT NO. 3	EXPIRATION DATE March 31, 2002
RADIOISOTOPE		MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION	STORAGE CONTAINER OR EXPOSURE DEVICE
ELEMENT	MASS NO.		CHEMICAL FORM--PHYSICAL STATE	AUTHORIZED USE

- C. Appropriate records are maintained which demonstrate the individual has met the above requirements, and Form DRC-20 has been filed with the Department.
- D. The individual has successfully completed within the past five (5) years a radiation safety examination administered by the Department or its agent. The examination must be successfully completed at least once every five (5) years.
- E. On-the-job training at temporary jobsites shall be under the direct personal supervision of the instructors listed in Attachment 1.
5. The licensee is authorized to receive, possess, and use sealed sources of Cobalt-60 and Iridium-192 where the radioactivity exceeds the amount of radioactivity specified in this license provided:
- A. Such sources do not exceed the quantity specified per source by more than 10% for Cobalt-60 or 20% for Iridium-192;
- B. Records of the licensee show that no more than the maximum amount of radioactivity specified per source above was ordered from the supplier or transferor of the radioactive material; and
- C. Levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in LAC 33:XV.540.
6. The licensee is authorized to receive, possess and transfer depleted uranium for use as shielding material in amounts not greater than 999 kilograms.
7. Tests for leakage and/or contamination of sealed sources listed in the schedule shall be performed in accordance with LAC 33:XV.544.
8. Except as specifically provided otherwise by the license, the licensee shall possess and use radioactive material described in all schedules of this license in accordance with statements, representations and procedures contained in the licensee's application dated February 29, 2000, and in all subsequent correspondence.

DBA:bt

*µCi-microcurie; mCi-millicurie; Ci-Curie

PAGE 1 SIGNED BY: Bliss M. Higgins Assistant Secretary	DATE	PAGE OF	PAGES
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DEPARTMENT OF ENVIRONMENTAL QUALITY
 OFFICE OF ENVIRONMENTAL SERVICES
 PERMITS DIVISION
 BATON ROUGE, LOUISIANA 70884-2135

LICENSEE Accurate NDE & Inspection, LLC		LICENSE NUMBER LA-10207-L01	AMENDMENT NO. 3	EXPIRATION DATE March 31, 2002	
RADIOISOTOPE ELEMENT		MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION CHEMICAL FORM--PHYSICAL STATE	STORAGE CONTAINER OR EXPOSURE DEVICE AUTHORIZED USE

ATTACHMENT I

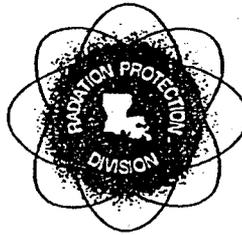
Instructors

Stephen L. Allen
 Charles Brignac, Jr.
 Glenn G. Brown
 Corey J. Lalonde
 Mitch F. Olivier
 Ted Louis Richard
 Roy J. Richard, Jr.

* μ Ci-microcurie; mCi-millicurie; Ci-Curie

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF AIR QUALITY AND RADIATION PROTECTION

RADIOACTIVE



MATERIAL LICENSE

LOUISIANA RADIATION PROTECTION DIVISION
P.O. BOX 82135
BATON ROUGE, LOUISIANA 70884-2135

Pursuant to the Louisiana Environmental Quality Act (Louisiana Revised Statutes 30:2101 et seq.) and the Louisiana Radiation Regulations, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, own, possess and transfer radioactive material for the purpose(s) and at the place(s) designated below. This license shall be deemed to contain the conditions specified in the Louisiana Revised Statutes 30:2105 of the Louisiana Nuclear Energy and Radiation Control Law, and is subject to all applicable rules, regulations, and orders of the Louisiana Radiation Protection Division now or hereinafter in effect, including the Louisiana Radiation Regulations (LAC 33:XXV) and to any condition specified in the license.

LICENSEE Accurate NDE & Inspection, LLC 8849 Highway 182 Opelousas, Louisiana 70570 Attention: Roy Richard Radiation Safety Officer	LICENSE NUMBER	EXPIRATION DATE
	LA-10207-L01	March 31, 2002
	AMENDMENT NUMBER	PREVIOUS AMENDMENTS ARE VOID
	4	
THIS LICENSE ISSUED PURSUANT TO AND IN ACCORDANCE WITH		
	Letters	
SIGNED BY:		DATE:
Roy Richard		July 2 & 19, 2000
		August 4, 2000
		August 25 & 27, 2000

RADIOISOTOPE		MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY * OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION		STORAGE CONTAINER OR EXPOSURE DEVICE	
ELEMENT	MASS NO.			CHEMICAL FORM - PHYSICAL STATE			AUTHORIZED USE
Cs	137	Any	111 mCi	Tech/Ops Model 77302	Tech/Ops Model 773		Instrument Calibration
Ir	192	Any	120 Ci	Industrial Nuclear Co. Models 32 and 33; Amersham Models 87703 or 87704; SPEC Models G-40F or G40T	Industrial Nuclear Company Model IR-100		Industrial Radiography
Ir	192	Any	150 Ci	SPEC Model G-36	SPEC CHECK II Model Pipeliner		Industrial Radiography
Ir	192	Any	100 Ci	SPEC Model G-23	Gamma Industries Pipeliner Model I		Industrial Radiography
Ir	192	Any	100 Ci	Amersham Models A424-9, A424-22 or 91813; RTS Model 702; SPEC Models T-5, T-5F, or T-7F	Amersham Model 660 System		Industrial Radiography

* pCi-picoCurie; μCi-MicroCurie; mCi-Millicurie; Ci-Curie

	Bliss M. Higgins	DATE	PAGE OF	PAGES
	Assistant Secretary	September 5, 2000	1	5

DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES
PERMITS DIVISION
BATON ROUGE, LOUISIANA 70884-2135

LICENSEE Accurate NDE & Inspection, LLC			LICENSE NUMBER LA-10207-L01		AMENDMENT NO. 4	EXPIRATION DATE March 31, 2002
RADIOISOTOPE		MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION	STORAGE CONTAINER OR EXPOSURE DEVICE	AUTHORIZED USE
ELEMENT	MASS NO.			CHEMICAL FORM--PHYSICAL STATE		
Ir	192	Any	150 Ci	SPEC Model G-60	SPEC Model 150	Industrial Radiography

The source exchange and storage devices listed below are authorized for use in accordance with the licensee's radiological Operating and Emergency Procedures:

Industrial Nuclear Model IR-50	Source Exchange and Storage
SPEC Model C-1	Source Exchange and Storage
Amersham Models 500-SU, 650L, 820 and 855	Source Exchange and Storage

1. A. Radioactive material shall be stored at Accurate NDE and Inspection, LLC, 146 Des Jaques Road, Lafayette, Louisiana and Accurate NDE and Inspection, LLC, 3314 Curtis Lane, New Iberia, Louisiana.
- B. Radioactive material shall be used only at temporary jobsites of the licensee, in areas not under exclusive Federal jurisdiction, throughout the State of Louisiana. Prior to operation at temporary jobsites, the licensee shall comply with applicable provisions of other regulations of the Department of Environmental Quality, and obtain all applicable state and local permits.
- C. This condition does not prohibit use in other Agreement States and states under the jurisdiction of the U.S. Nuclear Regulatory Commission under reciprocity procedures which may be established by an Agreement State or the U.S. Nuclear Regulatory Commission.
2. The Radiation Safety Officer for this license is Roy Richard.
3. This license does not authorize underwater radiography.
4. Pursuant to LAC 33:XV.575.A., the licensee may permit an individual to act as a radiographer provided:

*µCi-microcurie; mCi-millicurie; Ci-Curie

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RADIOISOTOPE		MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION	STORAGE CONTAINER OR EXPOSURE DEVICE
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- A. Verification of satisfactory completion has been received from a person approved by the Department, an Agreement State, or the Nuclear Regulatory Commission to conduct a radiography training program which meets the requirements equivalent to LAC 33:XV.575.A.1. If verification cannot be received, then the licensee may accept verification from the holder of a license issued by the Department, an Agreement State or the Nuclear Regulatory Commission that the individual has been employed as a radiographer as defined by LAC 33:XV.503; and
 - B. The individual has received instruction and training which meets the requirements of LAC 33:XV.575.A.2 and 3 as specified in the licensee's Operating and Emergency Procedures; and
 - C. Appropriate records are maintained which demonstrate the individual has met the above requirements, and Form DRC-20 has been filed with the Department.
 - D. The individual has successfully completed within the past five (5) years a radiation safety examination administered by the Department or its agent. The examination must be successfully completed at least once every five (5) years.
 - E. On-the-job training at temporary jobsites shall be under the direct personal supervision of the instructors listed in Attachment 1.
5. The licensee is authorized to receive, possess, and use sealed sources of Cobalt-60 and Iridium-192 where the radioactivity exceeds the amount of radioactivity specified in this license provided:
 - A. Such sources do not exceed the quantity specified per source by more than 10% for Cobalt-60 or 20% for Iridium-192;
 - B. Records of the licensee show that no more than the maximum amount of radioactivity specified per source above was ordered from the supplier or transferor of the radioactive material; and
 - C. Levels of radiation for radiographic exposure devices and storage containers do not exceed those specified in LAC 33:XV.540.
 6. The licensee is authorized to receive, possess and transfer depleted uranium for use as shielding material in amounts not greater than 999 kilograms.
 7. Tests for leakage and/or contamination of sealed sources listed in the schedule shall be performed in accordance with LAC 33:XV.544.

*µCi-microcurie; mCi-millicurie; Ci-Curie

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LICENSEE Accurate NDE & Inspection, LLC	LICENSE NUMBER LA-10207-L01	AMENDMENT NO. 4	EXPIRATION DATE March 31, 2002
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RADIOISOTOPE		MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION	STORAGE CONTAINER OR EXPOSURE DEVICE
ELEMENT	MASS NO.		CHEMICAL FORM--PHYSICAL STATE	AUTHORIZED USE

8. Notwithstanding the requirements of LAC 33:XV.550.1, and pursuant to LAC 33:XV.103.A, the licensee is authorized to use its Gamma Industries Pipeliner Model 1 and SPEC CHECK II Model Pipeliner exposure devices in accordance with procedures contained in your letters dated July 2, 2000 and August 27, 2000. This exemption will expire December 31, 2001.

9. Except as specifically provided otherwise by the license, the licensee shall possess and use radioactive material described in all schedules of this license in accordance with statements, representations and procedures contained in the licensee's application dated February 29, 2000, and in all subsequent correspondence.

DBA:bt

*µCi-microcurie; mCi-millicurie; Ci-Curie

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 PERMITS DIVISION
 BATON ROUGE, LOUISIANA 70834-2135

LICENSEE Accurate NDE & Inspection, LLC		LICENSE NUMBER LA-10207-L01	AMENDMENT NO. 4	EXPIRATION DATE March 31, 2002
RADIOISOTOPE ELEMENT	MAXIMUM NUMBER OF SOURCES	MAXIMUM ACTIVITY* OR QUANTITY PER SOURCE	SEALED SOURCE IDENTIFICATION CHEMICAL FORM--PHYSICAL STATE	STORAGE CONTAINER OR EXPOSURE DEVICE AUTHORIZED USE

ATTACHMENT I

Instructors

Stephen L. Allen
 Blair Bertrand
 Charles Brignac, Jr.
 Glenn G. Brown
 Chuck M. Lauglin
 Corey J. Lalonde
 Mitch F. Olivier
 Ted Louis Richard
 Roy J. Richard, Jr.
 Ogden James Splane

* μ Ci-microcurie; mCi-millicurie; Ci-Curie

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