



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

June 14, 2001

Global X-Ray & Testing Corporation
ATTN: William Johnston, III
Radiation Safety Officer
P. O. Box 1536
Morgan City, Louisiana 70381-1536

SUBJECT: EXEMPTION FROM 10 CFR 34.20(a)(1)

Dear Mr. Johnston:

This letter is in response to your letter dated July 11, 2000, requesting an amendment modifying an exemption from 10 CFR 34.20(a)(1) that was granted to Global X-Ray & Testing Corporation on November 5, 1999. This exemption from 10 CFR 34.20 allows you, as NRC's general licensee, to use any pipeliner industrial radiography exposure device identified on your Agreement State license. Under the provisions of the generic exemption you, as the general licensee, may use pipeliner radiography exposure devices to conduct offshore radiography activities on lay barges in the Gulf of Mexico in areas under Federal jurisdiction.

Approval of the above exemption is granted based on the implementation of the following compensatory safety measures:

- Radioactive sources used in pipeliner devices shall not exceed 100 Curies in order to reduce external dose rates.
- The maximum height at which the pipeliner exposure device can operate shall be limited to 5 feet above the barge deck to limit the risk of failure of a dropped device.
- The pipeliner exposure device must be secured to the pipe using robust attachment mechanisms, such as chains, binders, and/or steel springs in order to prevent the device from accidentally falling from the pipe onto the barge deck during operation.
- Whenever practical, extension rods, with a minimum length of 3 feet must be used to minimize personnel exposure. When extension rods are deemed impractical or unsafe, the reasons will be documented by the authorized user prior to commencing industrial radiography operations.
- When using a pipeliner exposure device, the operator(s) must, in addition to normal whole body dosimetry, wear extremity dosimetry on the wrist of the hand which could receive the highest exposure in order to document exposure to the extremities.

Enclosed is a copy of a notice published in the *Federal Register* on May 16, 2001. This notice includes an Environmental Assessment and a Finding of No Significant Impact supporting the exemption from 10 CFR 34.20.

Please note that this exemption request must be resubmitted **each calendar year** at the time that the initial NRC Form 241 is filed with the NRC. Also, this **exemption expires on January 31, 2003**, and that NRC will reevaluate the issue of pipeliner device use on lay barges at that time.

If you have any questions, please contact Charles L. Cain at (817) 860-8186 or Jack E. Whitten at (817) 860-8197.

Sincerely,

/RA/

Dwight D. Chamberlain, Director
Division of Nuclear Materials Safety

Enclosure: as stated

cc: Ronald L. Wascom, Administrator
Department of Environmental Services
P. O. Box 82135
Baton Rouge, Louisiana 70884-2135

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