



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

January 23, 2002

Bayou Inspection Services, Inc.
ATTN: Paul Fraley
Radiation Safety Officer
P.O. Box 1065
Amelia, LA 70340

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

Mr. Fraley:

This is in reference to our December 31, 2002, letter which documented approval for working under reciprocity in NRC jurisdiction during calendar year 2003 and approval for the existing exemption from 10 CFR 34.20(a)(1) through January 31, 2003. At that time, we informed you that the NRC would review the existing exemption.

The NRC is extending the exemption from the requirement of 10 CFR 34.20(a)(1) through December 31, 2003, which allows you, as NRC's general licensee, to use any pipeliner industrial radiography exposure device identified on your Agreement State license to conduct offshore radiography activities in areas under exclusive Federal jurisdiction.

Approval of the exemption is granted based on your continuing the implementation of the following compensatory safety measures, as documented in the NRC letter dated June 14, 2001.

- 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.

Bayou Inspection Services, Inc.

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Should you have any additional questions, or if I can be of further assistance in this matter, please call Rachel S. Browder at 817-276-6552 or the undersigned at 817-860-8186.

Sincerely,

/RA/

Charles L. Cain, Chief
Nuclear Materials Licensing Branch

cc:
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