



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

March 29, 2007

Docket No. 03021037

License No. 37-23410-01

Douglas Hensen  
President  
Titan Wireline Services  
P. O. Box 286  
Elderton, PA 15736

SUBJECT: INSPECTION 03021037/2007001, TITAN WIRELINE SERVICES, ELDERTON,  
PENNSYLVANIA SITE AND NOTICE OF VIOLATION

Dear Mr. Hensen:

On February 8, 2007, Jim Schmidt of this office conducted a safety inspection at the above address of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. The findings of the inspection were discussed with David Leshner of your organization by telephone on March 14, 2007.

Based on the results of this inspection, it appears that your activities were not conducted in full compliance with NRC requirements. A Notice of Violation is enclosed that categorizes each violation by severity level. You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

Current NRC regulations are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications Page**. The current Enforcement Policy is included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **About NRC; How We Regulate; Enforcement**; then **Enforcement Policy**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

D. Hensen  
Titan Wireline Services

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Please contact James Schmidt at 610-337-5276 if you have any questions regarding this matter.

Sincerely,

***Original signed by Marie Miller***

Marie Miller, Chief  
Security and Industrial Branch  
Division of Nuclear Materials Safety

Enclosure:  
Notice of Violation

cc:  
David Leshner, Radiation Safety Officer  
Commonwealth of Pennsylvania

D. Hensen  
Titan Wireline Services

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Distribution:  
D. J. Holody, RI

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**SUNSI Review Complete: JSchmidt**

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| NAME   | JSchmidt/JS |                                       | MMiller/MTM |                          |                          |                          |                          |
| DATE   | 03/29/07    |                                       | 03/30/07    |                          |                          |                          |                          |

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## NOTICE OF VIOLATION

Titan Wireline Services  
Elderton, PA

Docket No. 03021037  
License No. 37-23410-01

During an NRC inspection conducted on February 8 and March 14, 2007, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. 49 CFR 172.202(a) and (b) require in part, with exceptions not applicable here, that the shipping description of a hazardous material on the shipping paper include, in the following sequence: (1) the proper shipping name prescribed for the material in 172.101; (2) the hazard class prescribed for the material as shown in Column 3 of the 172.101 Table; and (3) the identification number prescribed for the material as shown in Column 4 of the 172.101 Table. Pursuant to 49 CFR 172.101, radioactive material is classified as hazardous material.

Contrary to the above, on March 8, 2007, the licensee transported licensed material outside the confines of the Elderton facility using shipping papers with an outdated proper shipping name and identification number. Specifically, the licensee used shipping papers describing hazardous material listed as UN2974 rather than the correct identification number of UN3332.

This is a Severity Level IV violation (Supplement V).

- B. 10 CFR 20.1101(c) requires that the licensee periodically review, at least annually, the radiation protection program content and implementation.

Contrary to the above, the licensee did not conduct at least annual reviews of the radiation protection program content and implementation. Specifically, the no annual program review was conducted since the last NRC inspection on May 20, 2004.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Titan Wireline Services is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region I, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, any response which contests an enforcement action shall be submitted under oath or affirmation.

Your response will be placed in the NRC Public Document Room (PDR) and on the NRC Web site. To the extent possible, it should, therefore, not include any personal privacy, proprietary, or safeguards information so that it can be made publically available without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated This 29 day of March 2007