



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005

September 20, 2007

Inspection Services, Inc.  
dba Caliber Inspection  
ATTN: Emery Roberts  
Radiation Safety Officer  
7820 South 210<sup>th</sup>, Suite 110  
Kent, Washington 98032

**SUBJECT: ADDITIONAL INFORMATION NEEDED TO AUTHORIZE INDUSTRIAL RADIOGRAPHY ON LAY-BARGES, OFFSHORE OIL AND GAS PLATFORMS, AND IN AN UNDERWATER ENVIRONMENT**

In your renewal application dated March 29, 2002, Inspection Services, Inc., requested authorization to perform industrial radiography on lay-barges, offshore oil and gas platforms, and in an underwater environment. During a recent audit of our licensing records, we discovered that for these special types of industrial radiography you failed to submit, and we failed to request, the unique operating, emergency, and security procedures for conducting these special types of industrial radiography. It is our intention to modify and clarify all industrial radiography licenses to specify the special types of radiography that a licensee is authorized to conduct in NRC's jurisdiction. To ensure that we accurately reflect your authorization to conduct industrial radiography on lay-barges, offshore oil and gas platforms, and in an underwater environment, we are requesting that you provide us a copy of the special operating, emergency, and security procedures you will use when conducting these special types of industrial radiography. NRC regulation 10 CFR 34.41(c) requires that a licensee may conduct lay-barge, offshore platform, or underwater radiography only if procedures have been approved by the Commission or by an Agreement State. Should you have a need to continue conducting these special types of industrial radiography, or wish to expand your authorization to add new authorizations, please specify the special types of industrial radiography you would like to request listed on your NRC license. Also, to support the request for authorization to conduct these special types of industrial radiography, please provide a copy of your operating, emergency, and security procedures that contains the information outlined below.

Operating, emergency, and security procedures specific to lay-barge, offshore platform, and underwater radiography should specifically address the following key elements.

- Transport of licensed material
- Storage facilities for licensed material
- Methods for restricting access to radiation areas
- Radiation safety procedures and radiographer responsibilities unique to lay-barge, offshore platform, or underwater radiography
- Radiographic equipment and radiation safety procedures unique to underwater radiography
- Methods appropriate for use of equipment in water environments

- Applicable inspection and maintenance procedures unique to lay-barge, offshore platform, or underwater radiography equipment
- Emergency procedures unique to lay-barge, offshore platform, or underwater radiography
- Security of licensed material

For reference in developing operating, emergency, and security procedures, we suggest that you use the guidance provided in NUREG-1556, Volume 2, Consolidated Guidance About Materials Licenses, Program-Specific Guidance About Industrial Radiography Licenses. NUREG-1556, Volume 2 can be found in NRC's website at:  
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v2/>.

To support your request to conduct industrial radiography on lay-barges, offshore oil and gas platforms, and in an underwater environment, and since no operating, emergency, and security procedures for these activities were docketed, we are requesting that you submit your procedures within 30 days of the receipt of this letter. Once the special procedures have been reviewed and approved, your NRC license will be amended to specifically list the special types of industrial radiography you are authorized to perform in NRC jurisdiction.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

**/RA/**

Roberto J. Torres, Senior Health Physicist  
Nuclear Materials Licensing Branch

Docket: 030-06638  
License: 46-03414-03