

**From:** Lewis Cessna  
**Sent:** Tuesday, June 15, 2010 10:50 PM  
**To:** Lodhi, Sattar  
**Cc:** John Srock; Marty Comini  
**Subject:** USNRC Corrective Action Follow-Up 6-15-10

Sattar,

I have composed this email in response to the potential violations generated as part of your investigation. Each potential violation that you explained during our conference call is listed along with each of Superior Well Services' corrective actions.

**Potential Violation 1:**

- (10 CFR 20.1802) Licensed material is to be maintained under constant surveillance.

**Corrective Action 1:**

- Load securement and radioactive material security was addressed company wide by Marty Comini, Wireline General Manager, on 7/22/09 in an email to the wireline managers titled "Source Securement 7-22-09". This email was followed by a second email, sharing the same title, on 11/9/09 requesting that each location submit a picture of their wireline unit with the corrective action in place. The pictures were reviewed by Marty Comini and Lew Cessna to ensure that the intent of the request had been met. By ensuring that proper load securement is in place, Superior Well Services can eliminate the possibility of sources of radioactive material becoming separated from the wireline truck.
- Superior Well Services has been discussing and will continue to discuss load securement and radioactive material security with Logging Supervisors and Logging Assistants during training.

**Potential Violation 2:**

- (10 CFR 20.2201) Failure to immediately notify the USNRC of lost or stolen licensed material.

**Corrective Action 2:**

- A section specifically focused on notification has been added to both the logging assistant's and logging supervisor's exams for the 2010 training year. The intent of the specific training is to ensure that each openhole employee is aware of the notification requirements for lost or stolen sources.

**Potential Violation 3:**

- (10 CFR 30.9) Failure to provide adequate and accurate information to an USNRC inspector.

**Corrective Action 3:**

- Monthly conference calls have been scheduled to improve communications between the Local Radiation Safety Officers, the Openhole Wireline Regional Managers, the Corporate Radiation Safety Officer and the Wireline General Manager. The conference call's objective is to bring to light any situations or potential issues that may have risen in the month prior and to ensure that all involved parties have an open line of communication amongst all levels of management.
- Superior Well Services' HSE Compliance Manager has received instruction from Superior Well Services' HSE Director on proper investigation procedures and has been able to further develop his investigation skills by reviewing his peer's investigations of vehicle accidents, work related injuries and near misses through the Risk Management

Department. The HSE Compliance Manager plans to attend an *Incident Investigation* course to further develop his investigation skills.

Potential Violation 4:

- (10 CFR 71.5 and 49 CFR 173.488) Failure to secure radioactive material transport containers during transport.

Corrective Action 4:

- Load securement and radioactive material security was addressed company wide by Marty Comini, Wireline General Manager, on 7/22/09 in an email to the wireline managers titled "Source Securement 7-22-09". This email was followed by a second email, sharing the same title, on 11/9/09 requesting that each location submit a picture of their wireline unit with the corrective action in place. The pictures were reviewed by Marty Comini and Lew Cessna to ensure that the intent of the request had been met. Each transport shield is required to be chained to a structural member of the truck and each transport shield holder is required to be fully welded to the box of the steel body trucks or securely bolted to the box of the fiberglass body trucks.
- Superior Well Services has instructed both Logging Supervisors and Logging Assistants to routinely inspect the transport shields for potential securement issues. Any issues must be reported to the employee's supervisor and actions must be taken to ensure proper load securement as soon as possible.

Potential Violation 5:

- (10 CFR 20.2202) Failure to maintain records of an annual program audit.

Corrective Action 5:

- Superior Well Services has adjusted the schedule of program auditing to increase the frequency of program audits. Each Local Radiation Safety Officer is required to complete one program audit per quarter and maintain record of the audit on file. The HSE Compliance Manager will, in turn, review each facility's Local Radiation Safety Officer's program two times per year. The HSE Compliance Manager will submit his documented audit to the HSE Director and Wireline General Manager for review once completed. This process allows for multiple program audits to be conducted throughout a calendar year.

In addition to the corrective actions listed above, Superior Well Services has changed the Corporate RSO to allow for additional attention to detail in all facets of the radiation safety program. The HSE Compliance Manager, who is also now the Corporate RSO, can devote the time needed to maintain a program that is in compliance with the applicable regulations and also be proactive in regards to public and employee safety.

Please feel free to contact me if you require any additional information.

Respectfully,



Lew Cessna  
HSE Compliance Manager  
Superior Well Services  
724-403-9080 (Office)  
724-840-8541 (Mobile)  
866-446-SWSI (Fax)