



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
612 EAST LAMAR BLVD, SUITE 400  
ARLINGTON, TEXAS 76011-4125

June 8, 2011

EA-11-100

Mr. Robert Ledet, President  
Owensby and Kritikos, Inc.  
671 Whitney Avenue Bldg "B"  
Gretna, Louisiana 70056

SUBJECT: NRC INSPECTION REPORT 150-00017/2010-003 AND NOTICE OF VIOLATION

Dear Mr. Ledet:

This refers to the inspection conducted on July 29, 2010, at temporary jobsites onboard two offshore oil and gas platforms located in the Gulf of Mexico, and to our subsequent in-office inspection of your activities.

The inspection was an examination of activities conducted under the general license of 10 CFR 150.20 as it relates to radiation safety, compliance with the Commission's rules and regulations, and the conditions of your agreement state license (State of Louisiana Radioactive Materials License LA-2234-L01). Within these areas, the inspection consisted of selected examination of procedures and representative records and interviews with personnel. Preliminary inspection findings were discussed with your staff at the conclusion of the onsite portion of the inspection on August 23, 2010.

During our in-office reviews, Mr. Scott Barbier, Vice President and Assistant General Manager of Owensby and Kritikos, Inc., documented the corrective actions that you had taken in response to the inspection in a letter dated January 6, 2011 (ML110060852). Since the letter contains security-related information as defined in 10 CFR 2.390(d)(1), it is being withheld from public disclosure. A final exit briefing was conducted with you and Mr. Barbier on February 11, 2011. The enclosed report presents the results of the inspection of your radiation safety program.

During our February 11 telephonic exit briefing, Mr. Michael Vasquez of my staff, informed you and Mr. Barbier, that the NRC was considering escalated enforcement for a violation involving the failure to secure licensed material that was stored in a darkroom, as required by 10 CFR 20.1801 and 20.1802. Mr. Vasquez also reviewed with you other violations, which were not considered for escalated enforcement. He informed you that the NRC had sufficient information regarding the violations and your corrective actions to make an enforcement decision without the need for a predecisional enforcement conference or a written response

from you. You stated that Owensby and Kritikos, Inc., did not believe that a predecisional enforcement conference or written response was needed, and that the NRC could proceed with making its enforcement decisions. As a result, our enforcement decisions are discussed below.

Based on the information developed during the inspection and the information that you provided in your letter dated January 6, 2011, the NRC has determined that violations of NRC requirements occurred. These violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding each are described in detail in the enclosed inspection report. The first violation is the most significant and involves a failure to secure licensed material from unauthorized access or removal when it was being stored and when your staff was not maintaining constant surveillance over the material as required by 10 CFR 20.1801 and 20.1802. This is considered significant because this requirement provides reasonable assurance that inadvertent and potentially significant exposures to radiation will be prevented. Therefore, this violation has been categorized in accordance with the NRC Enforcement Policy at Severity Level III. The NRC Enforcement Policy may be found on the NRC Web site at [www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html](http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html).

In accordance with the NRC Enforcement Policy, a base civil penalty in the amount of \$7,000 is considered for a Severity Level III violation. Because your facility has not been the subject of escalated enforcement actions within the last 2 years, the NRC considered whether credit was warranted for *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. The NRC determined that your corrective actions were prompt and comprehensive. You immediately ceased offshore operations, secured the radiographic exposure devices in accordance with NRC requirements, and returned the radiography exposure devices and the darkrooms to shore. You enhanced security for the darkrooms, modified procedures, re-trained your radiographers, and performed equipment checks before sending it offshore.

Therefore, to encourage prompt and comprehensive correction of violations, and in recognition of the absence of previous escalated enforcement action, I have been authorized, after consultation with the Director, Office of Enforcement, not to propose a civil penalty in this case. However, significant violations in the future could result in a civil penalty. In addition, issuance of a Severity Level III violation constitutes escalated enforcement action that may subject you to increased inspection effort.

Three additional violations are cited in the enclosed Notice and have been categorized at Severity Level IV. These violations involved failures to: 1) maintain copies of specified documents as required by 10 CFR 34.89(b); 2) post the darkrooms with a sign bearing the words, "Caution Radioactive Materials," in accordance with 10 CFR 20.1902(e); and 3) label transport packages as required by 10 CFR 71.5 and 49 CFR 172.403. These violations are cited in the Notice because they were identified by the NRC.

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken, corrective actions taken to prevent recurrence and the date when full compliance was achieved is adequately addressed on the docket in the enclosed inspection report (Enclosure 2) and in your letter dated January 6, 2011 (ML110060852), which contains security-related information and will not be publicly available. Therefore, you are not required to respond

to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response to those issues (if you provide one), will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response (if you provide one) should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

If personal privacy or proprietary information is necessary to provide an acceptable response, please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such information, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). The NRC includes significant enforcement actions on its Web site at (<http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>).

If you have any questions concerning this matter, please contact Ms. Vivian Campbell of my staff. Ms. Campbell can be reached at 817-860-8287.

Sincerely,

*/RA/*

Elmo E. Collins  
Regional Administrator

Docket: 150-00017  
License: General License Pursuant to  
10 CFR 150.20

Enclosures:

1. Notice of Violation
2. NRC Inspection  
Report 150-00017/2010-003

cc (w/Enclosures):

Tim Knight, Administrator  
Emergency & Radiological Services Div.  
Environmental Compliance  
P.O. Box 4312  
Baton Rouge, LA 70821-4312

Distribution:

**OEMailResource;**

RidsSecyMailCenter Resource;  
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[Martha.Poston-Brown@nrc.gov](mailto:Martha.Poston-Brown@nrc.gov);

Hard copy: DNMS Docket File DNMS Secretarial File

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ADAMS	X Yes	X SUNSI Review Complete	Reviewer Initials: MPB	
✓ Publicly Available			√ Non-sensitive	
DNMS:NMSB-A	DNMS:NMSB-A	C:NMSB-A	ACES	RC
MPoston-Brown	GMVasquez	VHCampbell	MCMaier	KJFuller
/RA/	/RA/	/RA/	/RA/	/RA/
5/17/11	5/17/11	5/20/11	5/26/11	6/2/11
D:DNMS	DRA	OE		RA
RJCaniano	ATHowell	LSreenivas		EECollins
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6/03/11	6/06/11	6/07/11		6/08/11

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## NOTICE OF VIOLATION

Owensby and Kritikos, Inc.  
Gretna, Louisiana

Docket: 150-00017  
License: General License Pursuant to  
10 CFR 150.20  
EA-11-100

During an NRC inspection conducted on July 29, 2010, violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. 10 CFR 20.1801 requires that the licensee secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas. 10 CFR 20.1802 requires that the licensee control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage. 10 CFR 20.1003 defines a *controlled area* as, an area outside of a restricted area but inside a site boundary, access to which can be limited by the licensee for any reason; and *unrestricted area* means an area, access to which is neither limited nor controlled by the licensee.

Contrary to the above, on July 29, 2010, the licensee failed to secure from unauthorized removal or limit access to a radiography camera containing 19.4 curies of iridium-192 located on oil and gas platform Mississippi Canyon 920A, which was an unrestricted area, nor did the licensee control and maintain constant surveillance of this licensed material. Specifically, the inspector found the radiography camera on the floor of the unlocked darkroom and no radiography personnel were maintaining constant surveillance over the material.

This is a Severity Level III violation (Section 6.7).

- B. 10 CFR 34.89(b) requires, in part, that each licensee also maintain copies of the following documents and records sufficient to demonstrate compliance at each applicable field station and each temporary jobsite;
1. 10 CFR 34.89(b)(2) requires the licensee to maintain a copy of 10 CFR Parts 19, 20, and 34;
  2. 10 CFR 34.89(b)(7) requires the licensee to maintain a copy of Operating and Emergency Procedures required by 10 CFR 34.81; and
  3. 10 CFR 34.89(b)(12) requires the licensee to maintain a copy of the Agreement State license authorizing the use of licensed materials when operating under reciprocity pursuant to 10 CFR 150.20.

Contrary to the above, on July 29, 2010, while conducting industrial radiography activities at the Mississippi Canyon 920A platform, the licensee did not possess a copy of 10 CFR Part 34 in violation of 10 CFR 34.89(b)(2). In addition, while conducting industrial radiography at the Delta 45 "CQ" platform, the licensee did not possess copies of: (1) 10 CFR Parts 19, 20, and 34; (2) operating and emergency procedures; and (3) its Agreement State license.

This is a Severity Level IV violation (Section 6.3).

- C. 10 CFR 20.1902(e) states that the licensee shall post each area or room in which there is used or stored an amount of licensed material exceeding 10 times the quantity of such material specified in Appendix C to Part 20 with a conspicuous sign or signs bearing the radiation symbol and the words, "CAUTION, RADIOACTIVE MATERIAL(S)" or "DANGER, RADIOACTIVE MATERIAL(S)."

Contrary to the above, on July 29, 2010, the licensee failed to post darkrooms, which were being used to store an amount of licensed material exceeding 10 times the quantity of iridium-192 specified in Appendix C to Part 20 with a sign bearing the radiation symbol and the words, "CAUTION, RADIOACTIVE MATERIAL(S)" or "DANGER, RADIOACTIVE MATERIALS." Specifically, the darkrooms were being used at temporary jobsites located on offshore oil and gas platforms, Mississippi Canyon 920A and West Delta 45 "CQ."

This is a Severity Level IV violation (Section 6.3).

- D. 10 CFR 71.5(a) requires that a licensee who transports licensed material outside of the site of usage, as specified in the NRC license, or where transport is on public highways or who delivers licensed material to a carrier for transport, comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 107, 171-180, and 390-397.

49 CFR 172.403 requires, in part, with exceptions not applicable here, that each package of radioactive material be labeled, as appropriate, with two Radioactive White-I, Radioactive Yellow-II, or Radioactive Yellow-III labels affixed to opposite sides of the package. The contents, activity, and transport index must be entered in the blank spaces on the label using legible printing, and a durable, weather resistant means of marking. The contents entered on the label must include the name or abbreviation (e.g., <sup>99</sup>Mo) of the radionuclides as taken from the listing of radionuclides in 49 CFR 173.435 or, for mixtures of radionuclides, with consideration of space available on the label, those nuclides determined in accordance with the provisions of 49 CFR 173.433(g). The activity in each package must be expressed in terms of the appropriate SI units, or in terms of appropriate SI units followed by appropriate customary units in parentheses.

Contrary to the above, on July 27-29, 2010, the licensee delivered to a carrier for transport two separate packages of radioactive material containing iridium-192, and the contents, activity, or transport index were not entered in the blank spaces on the RADIOACTIVE Yellow II labels that were affixed to the packages.

This is a Severity Level IV violation (Section 6.8).

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved, is adequately addressed on the docket in your letter dated January 6, 2011 (ML110060852), and NRC Inspection Report 150-00017/2010-003. Therefore, you are not required to submit a written statement or explanation pursuant to 10 CFR 2.201 unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation, EA-11-100," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional

Administrator, Region IV, 612 E. Lamar Boulevard, Suite 400, Arlington, Texas 76011, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you are required to post this Notice within 2 working days of receipt.

Dated this 8<sup>th</sup> day of June 2011

U.S. NUCLEAR REGULATORY COMMISSION  
REGION IV

Inspection: 150-00017/2010-003

Docket: 150-00017

License: General License Pursuant to  
10 CFR 150.20 (LA-2234-L01)

Licensee: Owensby and Kritikos, Inc.  
671 Whitney Ave, Bldg "B"  
Gretna, Louisiana

Location Inspected: Oil and gas platforms  
Mississippi Canyon 920A and  
West Delta 45 "CQ"  
Federal Waters, Gulf of Mexico

Inspection Dates: July 29 through February 11, 2011

Inspector: Lawrence Donovan, Health Physicist  
Nuclear Materials Safety Branch A  
Division of Nuclear Materials Safety

Approved By: Vivian Campbell, Chief  
Nuclear Materials Safety Branch A  
Division of Nuclear Materials Safety



## EXECUTIVE SUMMARY

Owensby and Kritikos, Inc.  
NRC Inspection Report 150-00017/2010-003

This report documents the results of unannounced inspections of industrial radiography activities conducted by Owensby and Kritikos, Inc., at two separate offshore oil and gas platforms in Federal Waters in the Gulf of Mexico on July 29, 2010, and the subsequent in-office reviews. The inspections were an examination of activities conducted under the general license of 10 CFR 150.20 as they related to radiation safety and security and to compliance with the Commission's rules and regulations, as well as with the conditions of the license. Within these areas, the inspections consisted of observations of activities and interviews with licensee personnel.

### Program Overview

During the inspection, Owensby and Kritikos, Inc. (a Louisiana Agreement State licensee) was conducting industrial radiography activities under reciprocity pursuant to 10 CFR 150.20, at temporary job sites in Federal waters where the NRC maintains jurisdiction for regulating the use of licensed material.

### Violation Considered for Escalated Enforcement

The licensee failed to secure from unauthorized removal or access, licensed materials that were stored in controlled or unrestricted areas. Specifically, the darkroom on Mississippi Canyon 920A platform was unattended and unlocked upon the inspector's arrival, providing unauthorized access to 19.4 curies of iridium-192 in a radiographic exposure device. This is a violation of 10 CFR 20.1801 and 20.1802.

### Violations not Considered for Escalated Enforcement

- The licensee failed to have several documents required by 10 CFR 34.89(b) at the temporary job sites. Documents that were not available include 10 CFR 19, 20, and 34, Standard and Emergency Procedures, and a copy of the radioactive material license;
- The licensee failed to post its dark room, where licensed material was stored, with the sign "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL," as required by 10 CFR 20.1902(e);
- The licensee failed to complete the Department of Transportation Yellow II transport labels affixed to the radiographic exposure devices to identify isotope name, activity, and transport index as required by 10 CFR 71.5 and 49 CFR 172.403.

### Corrective Actions

- The radiography camera was secured in the storage vault and the storage vault was locked with a hasp and padlock at the time of the inspection.
- Posting and labeling were corrected at the time of the inspection.
- The radiography crews contacted the radiation safety officer so that the documents required by 10 CFR 34.89 could be faxed to both platforms.
- The licensee stopped all offshore work and returned all darkrooms to shore.
- The licensee revised their security procedures to increase the security of material stored in the darkrooms used off-shore.
- All radiographers and radiographers' assistants were re-trained on the regulatory requirements and operational procedures.

## REPORT DETAILS

### **1 Program Overview (87121)**

#### **1.1 Inspection Scope**

This report summarizes the findings from unannounced temporary jobsite inspections on July 29, 2010, at two separate oil and gas platforms, located at Mississippi Canyon 920A and West Delta 45 "CQ." Both of these locations were in areas of Federal jurisdiction in the Gulf of Mexico. The inspections consisted of observed conditions at the temporary jobsite, interviews with licensee staff, and an examination of industrial radiography camera storage.

#### **1.2 Observations and Findings**

Owensby and Kritikos, Inc., who has a specific license issued by the State of Louisiana, is authorized to perform industrial radiography. Owensby and Kritikos, Inc., filed an NRC Form 241 with the NRC Region IV office to conduct industrial radiography in the Gulf of Mexico, as required by 10 CFR 150.20. As such, Owensby and Kritikos, Inc., was granted a general license in accordance with 10 CFR 150.20 to use iridium-192 on oil and gas platforms at Mississippi Canyon 920A and West Delta 45 "CQ" in the Gulf of Mexico where the NRC maintains jurisdiction.

### **2 Inspection Findings**

#### **2.1 Inspection Scope at Mississippi Canyon 920A**

The inspector conducted a safety inspection at the Mississippi Canyon 920A location. This included observing the licensee temporary jobsite work activities and storage location, and touring the general setup of the offshore platform work. Owensby and Kritikos, Inc., assigned a two-person crew consisting of a radiographer and an assistant radiographer.

##### **2.1.1 Observations and Findings at Mississippi Canyon 920A**

- ***Material Safety and Control***

Title 10 CFR 20.1801 requires the licensee to secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas. Title 10 CFR 20.1802 requires the licensee to control and maintain constant surveillance of licensed material that is in a controlled or unrestricted area and that is not in storage.

Upon arrival at the darkroom, the inspector observed that no Owensby and Kritikos, Inc., personnel were present to maintain control or constant surveillance over the darkroom and licensed material stored in the darkroom. The darkroom door was

open and a radiographic exposure device was on the floor under a cabinet. Within a few minutes the platform staff located the Owensby and Kritikos, Inc., crew and they promptly returned to the darkroom. The radiographer stated that he recalled only closing the door, not locking it.

The inspector observed a storage vault inside the darkroom underneath the table top, with a lock hanging over the hasp but the lock was not engaged. Although the storage vault could have been used to secure the camera, it was not. The failure to secure from unauthorized removal or access licensed materials that were stored in controlled or unrestricted areas was identified as a violation of 10 CFR 20.1801 and 20.1802. (150-00017/2010-003-01)

- ***Instrumentation, Posting, Labeling, and Documentation***

The inspector found that all radiation detection instrumentation was in calibration at the time of the inspection. This equipment included alarming rate meters, personnel ionization chambers, survey meters, and thermoluminescent devices (TLDs).

Title 10 CFR 34.89(b) requires, in part, that the licensee maintain copies of specific documents and records, such as certain NRC regulations, utilization records, daily checks of equipment, etc., sufficient to demonstrate compliance at each temporary job site. When reviewing compliance with 10 CFR 34.89(b), the inspector found that the crew had possession of several of the documents, except NRC's regulations 10 CFR Part 34, "Licenses for Industrial Radiography and Radiation Safety Requirements for Industrial Radiographic Operations," which is required by 10 CFR 34.89(b)(2). This was identified as a violation of 10 CFR 34.89(b). (150-00017/2010-003-02)

Title 10 CFR 20.1902(e) requires the licensee to post each room in which there is used or stored an amount of licensed material exceeding 10 times the quantity of such material specified in Appendix C to Part 20 with a conspicuous sign or signs bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL(S)" or "DANGER, RADIOACTIVE MATERIAL(S)." The inspector observed that radioactive material required to be stored in a room posted in accordance with 10 CFR 20.1902(e) was stored in a darkroom that was not posted with conspicuous sign or signs. Failure to post the darkroom, where radioactive material was stored, was identified as a violation of 10 CFR 20.1902(e). (150-00017/2010-003-03)

Title 10 CFR 71.5 and 49 CFR 172.403(g) require that each package of radioactive material that is transported, unless excepted from labeling, must be labeled with a radioactive label describing the contents, activity and transport index. The inspector observed that the radiographic exposure camera was labeled with a Department of Transportation Yellow II Transport label, but the isotope identification, source activity, and transportation index were left blank. The package of radioactive material had been shipped to the platform on July 27, 2010. This was identified as a violation of 10 CFR 71.5 and 49 CFR 172.403(g). (150-00017/2010-003-04)

## 2.2 Inspection Scope at West Delta 45 “CQ”

At the West Delta 45 “CQ” location, the inspector observed the temporary jobsite storage location, and toured the general setup of the offshore platform work. Owensby and Kritikos, Inc., had assigned a two-person crew consisting of one radiographer and one assistant radiographer. The inspector arrived at the platform prior to Owensby and Kritikos, Inc., conducting any radiographic exposures.

### 2.2.1 Observations and Findings at West Delta 45 “CQ”

- ***Instrumentation, Posting, Labeling, and Documentation***

The inspector found that all radiation detection instrumentation was in calibration at the time of the inspection. This equipment included alarming rate meters, personnel ionization chambers, survey meters, and TLDs.

The inspector found that the licensee did not possess many of the documents required by 10 CFR 34.89(b)(1-12), “*Location of documents and records.*” Specifically, the radiography crew did not possess: 1) a copy of 10 CFR Parts 19, 20, and 34, as required by 10 CFR 34.89(b)(2); 2) a copy of the operating and emergency procedures, as required by 10 CFR 34.89(b)(7); and 3) a copy of Owensby and Kritikos, Inc.’s, Agreement State license as required by 10 CFR 34.89(b)(12). This was identified as another example of a violation of 10 CFR 34.89(b). (150-00017/2010-003-02)

The inspector observed that the darkroom where the radioactive material in quantities requiring posting was stored, was not posted with “CAUTION RADIOACTIVE MATERIAL(S)” or “DANGER RADIOACTIVE MATERIAL(S)” signs. This was identified as another example of a violation of 10 CFR 20.1902(e). (150-00017/2010-003-03)

The radiographic exposure device had a Department of Transportation Yellow II Transport label affixed to it, but the contents, activity, and transport index were left blank. This was identified as another example of a violation of 10 CFR 71.5 and 49 CFR 172.403(g). (150-00017/2010-003-04)

## 2.3 Conclusions

The inspector identified a violation, which is being considered for escalated enforcement, of 10 CFR 20.1801 and 20.1802 involving the failure to secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas at the Mississippi Canyon 920A platform. Additionally, the inspector identified three violations, not being considered for escalated enforcement, associated with: 1) failing to maintain required documents; 2) failing to post a sign bearing the words, “CAUTION RADIOACTIVE MATERIALS” or “DANGER RADIOACTIVE MATERIAL(S)” on the darkrooms; and 3) failing to label the contents, activity and transport index on the radiographic exposure device as required by Department of Transportation regulations.

### **3 Corrective Actions**

#### **3.1 Immediate Corrective Actions (Mississippi Canyon 920A)**

The licensee immediately secured the camera in the storage vault and locked the vault using the hasp and lock. Additionally, the radiographer committed to locking the darkroom door whenever licensee personnel would not be in the immediate area to provide direct physical surveillance. Posting and labeling was corrected at the time of the inspection. Radiography crews contacted the radiation safety officer to fax the missing documents to the platform.

#### **3.2 Long-term Corrective Actions (both locations)**

The licensee stopped all offshore work and returned all darkrooms to shore. The licensee installed new security enhancements on all darkrooms used off-shore. Additionally, the licensee implemented a change in written procedures to require radiographers to check darkrooms to be sure proper paperwork and necessary signs are available in the darkrooms, prior to shipping the darkrooms to offshore locations.

All active radiographers attended a training class that covered the safe possession and use of radioactive materials, and the new security enhancements on all darkrooms used off-shore. Specific emphasis was placed on security, labeling and maintaining the required documents. In addition, the President of Owensby and Kritikos, Inc., met with all the managers and supervisors responsible for radiography operations and emphasized his expectations and commitment that all required rules and regulations must be followed. These were documented in the licensee's letter to the NRC dated January 6, 2011 [ML110060852].

#### **3.3 Conclusions**

The license took immediate and long-term corrective actions to restore compliance. Short-term corrective actions included locking the metal harness over the camera and committing to locking the darkroom when licensee personnel were not in direct physical surveillance of the camera. Long-term actions included the licensee revision of operating procedures to ensure that the crew conducts security checks whenever the source is unattended. Expectations associated with compliance were emphasized with all the managers and supervisors responsible for radiographic operations. Radiographers were provided with additional training and procedures were revised to require additional checks of darkroom supplies prior to the shipment of darkrooms offshore.

### **4 Exit Meeting Summary**

A preliminary exit briefing was conducted at the conclusion of the onsite inspection with the radiography crews. A preliminary telephonic exit briefing was conducted with the President of Owensby and Kritikos, Inc., on August 23, 2010, to review the inspection findings as presented in this report. A final exit briefing was conducted with the licensee's President on February 11, 2011. No proprietary information was discussed.

PARTIAL LIST OF PERSONS CONTACTED

\*Ronald Judice, Radiographer, Mississippi Canyon 920A  
\*Brandon Guernsy, Assistant Radiographer, Mississippi Canyon 920A  
+Robert Ledet, President  
Scott Barbier, Vice President and Assistant General Manager

+Individual present for exit meeting  
\*Individuals present at the entrance meeting

INSPECTION PROCEDURES USED

87121 Industrial Radiography Programs

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

150-00017/2010-003-01	VIO	Failure to secure radioactive material from unauthorized removal or access for materials in unrestricted or controlled areas as required by 10 CFR 20.1801 and 20.1802.
150-00017/2010-003-02	VIO	Failure to maintain copies of required documents and records necessary to demonstrate compliance at each field station or temporary jobsite as required by 10 CFR 34.89(b).
150-00017/2010-003-03	VIO	Failure to post each location where radioactive material is stored with appropriate signs as required by 10 CFR 20.1902(e).
150-00017/2010-003-04	VIO	Failure to appropriately label a package provided for transport with the necessary information to identify contents, activity, and transport index as required by 10 CFR 71.5.

## LIST OF ACRONYMS USED

CFR *Code of Federal Regulations*  
EA enforcement action  
NRC Nuclear Regulatory Commission  
TLD thermoluminescent dosimeter