

9 1987

License: 35-00502-02
Docket: 30-05900
EA: 87-35

Halliburton Company
1015 Bois D'Arc
Duncan, Oklahoma 73536

Gentlemen:

Enclosed please find NRC Inspection Report 30-05900/87-02 documenting the enforcement conference held on May 27, 1987. The enforcement conference was held to review the findings of the NRC inspection conducted at your facility December 8-12, 1986, and to obtain your response to these findings. Enforcement correspondence concerning these matters will be sent to you under separate cover.

Should you have any questions concerning this letter, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:
WILLIAM L. FISHER

William L. Fisher, Chief
Nuclear Materials and Emergency
Preparedness Branch

Enclosure:
Appendix - NRC Inspection Report
30-05900/87-02

cc w/enclosure:
Oklahoma Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
WLFisher
*Inspector
*MIS System
*RSTS Operator

RLBangart
*DWeiss, RM/ALF
*NMIS
*RIV Files (2)

*w/766

RIV:NMIS
LTRicketson;ap
6/5/87

C:NMIS
RJEverett
6/5/87

C:NMEPB
WLFisher
6/5/87

D:DASS
RLBangart
6/18/87

EO
DAPowers
6/18/87

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REG4 LIC30
35-00502-02 PDR

B-13
JE07
11

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

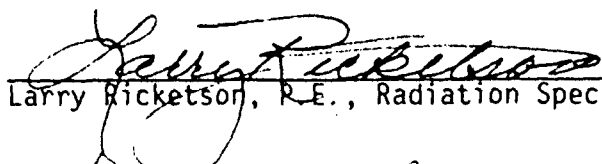
NRC Inspection Report: 30-05900/87-02 License: 35-00502-02

Docket: 30-05900

Licensee: Halliburton Company
1015 Bois D'Arc
Duncan, Oklahoma 73536

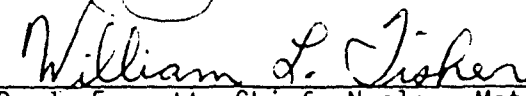
Conference Conducted: May 27, 1987

Report Prepared By:


Larry Ricketson, R.E., Radiation Specialist

6-9-87
Date

Approved:

for 
R. J. Everett, Chief, Nuclear Materials
Inspection Section

6-9-87
Date

Conference Summary

Conference held on May 27, 1987 (Report: 30-05900/87-02)

An enforcement conference was held at the Region IV office in Arlington, Texas, to discuss the findings of the NRC inspection conducted December 8-12, 1986, and other matters of NRC concern.

The NRC expressed concern that there seemed to be no single entity within the Halliburton company to coordinate radiation safety operations and to communicate inspection results between the different parts of the parent company.

The NRC reviewed 12 violations of NRC requirements identified during the inspection on December 12, 1986, and one additional apparent violation that came to light later during the enforcement conference on January 26, 1987.

The licensee's representatives stated that, although employed by Halliburton Services Division, they were empowered to speak for Halliburton Company.

Halliburton's representatives presented the following as a representation of the corporate structure of Halliburton Company.

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HALLIBURTON COMPANY

Oil Field Services

Construction

[Halliburton Services]	[Otis Engineering]	[Brown & Root]	[N.U.S.]
[Vann Systems]			
[Welex]			

The following issues, as included with the meeting agenda, were discussed:

1. What transpired after Halliburton Industrial Services, Inc. (HISI), ceased to exist as a corporate entity? Why were the appropriate license termination papers not submitted? To what extent were activities authorized under the license held by HISI assumed by Halliburton Company?

Halliburton's Response: There were no changes in company operation. Failure to submit a request for termination of license 35-00502-05 was an oversight. Activities continued, as before, with the same personnel and responsibility was assumed by Halliburton Company.

2. Does Halliburton Company assume the legal responsibilities for the violations identified under the license held by HISI?

Halliburton's Response: As stated above, Halliburton Company assumed responsibility.

3. Is there an identifiable entity within Halliburton Company that is responsible for all licenses?

Halliburton's Response: There is no such entity. It would, however, be possible to establish the Manager of Government Regulations, Halliburton Services Division as a liaison with the other members of the Oil Field Services group to ensure that inspection findings at one location become known to all.

4. What are Halliburton Company's views concerning consolidation of various licenses held by the company?

Halliburton's Response: They would prefer not to consolidate all licenses, although it would not have objections to the consolidation of those licenses having to do with oil field service operations, with the exception of the Welex Division license.

The NRC stated that it would be preferable to have any incorporated entities such as Otis Engineering, Inc. under a separate license.

Halliburton Company representatives stated that they would be willing to work toward resolution of this situation.

5. What are Halliburton Company's views concerning the obtaining of a separate license for Otis Engineering, a wholly owned subsidiary?

Halliburton's Response: Because the use of licensed material by Otis Engineering is limited in location and scope, it behooves Halliburton Company not to require Otis Engineering to have a separate radiation safety program. However, Halliburton Company is willing to work to resolve the situation.

In further discussion, the NRC expressed the opinion that there was a need for a corporate-wide internal audit program as well as just a means for disseminating information.

The Halliburton Company representatives stated that they would supply to the NRC for approval a written plan and commitment to deal with the foregoing concerns.

Persons Participating in the Conference

1. Licensee

Alan A. Baker, President, Halliburton Services Division

William C. McCoy, Vice President and General Counsel

Ron Bechtel, Manager, Department of Government Regulations

Richard A. Leonardi, Radiation Safety Officer, Halliburton Services
Division

2. NRC - Region IV

Robert Martin, Regional Administrator

Richard Bangart, Director, Division of Radiation Safety and Safeguards

Jerry Everett, Chief, Nuclear Material Inspection Section

Larry Ricketson, Radiation Specialist, Nuclear Material Inspection Section

Perry Robinson, Office of Enforcement

Bruce Carrico, Nuclear Materials Safety and Safeguards

Henry J. McGurren, Office of General Counsel