



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BLVD
ARLINGTON, TEXAS 76011-4511

November 14, 2012

EA-11-172
CAL-4-11-002

Mr. John Lockwood, President
Acuren Inspection, Inc.
43 Arch Street
Greenwich, Connecticut 06830

SUBJECT: NRC INSPECTION REPORT 030-34780/2012-001 (Form 591M)

Dear Mr. Lockwood:

This letter and the enclosed NRC Form 591M (Enclosure 1) refer to a safety inspection conducted on September 19, 2012, at your facility in La Porte, Texas. The inspection was an examination of activities conducted under NRC License 42-27593-01, as they related to safety and compliance with the Commission's rules and regulations and the conditions of the license.

Additionally, the inspector reviewed the licensee's corrective actions in response to a Confirmatory Action Letter (CAL-4-11-002) issued to Acuren Inspection, Inc. on August 4, 2011. The CAL was issued as a result of inspection activities occurring July 20 and August 3-4, 2010, at three temporary jobsites in the state of Michigan and subsequent inspection activities conducted on June 28, 2011, in Buffalo, Wyoming. Based on the inspector's review of the commitments made in the CAL and Acuren's corrective actions detailed in Enclosure 2, the inspector found that all the actions described in the CAL have been taken, and the NRC considers the CAL closed. A final exit briefing was conducted with Ms. Gayle Staton, Director of Radiation Safety on November 6, 2012.

Within the scope of this inspection, no violations or deviations were identified; therefore no response to this letter or the enclosed NRC Form 591M Part 1 is required.

Mr. John Lockwood

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

Should you have any questions concerning this letter, please contact the undersigned at 817-200-1130.

Sincerely,

/RA/

G. Michael Vasquez, Chief
Nuclear Materials Safety Branch A

Docket: 030-34780
License: 42-27593-01

Enclosures:

1. 591M Safety Inspection September 19, 2012
2. CAL reconciliation

cc w/enclosure:
Texas Radiation Control Program Director

Ms. Gayle Staton, Radiation Safety Director
Acuren Inspection, Inc.
43 Arch Street
Greenwich, Connecticut 06830

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ADAMS: <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> SUNSI Review Complete	Reviewer Initials: MRP
	<input checked="" type="checkbox"/> Publicly Available	<input checked="" type="checkbox"/> Non-Sensitive
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Acuren CAL Reconciliation

Commitment 1 – Emergency Stand-down

Acuren Inspection Inc. (Acuren) will conduct a company-wide stand-down to discuss the recent inspection in Michigan and Wyoming, the theft of a radiography camera in Texas, and the security requirements associated with radiographic exposure devices (also known as Increased Controls or ICs.)

By August 15, 2011, the Chief Operating Officer, of Acuren Inspections, Inc. will issue a memorandum to all radiography employees emphasizing the importance of adhering to the Increased Controls requirements for radiographic exposure devices.

Actions for Item 1

Acuren conducted a company-wide stand-down on July 19, 2011. On August 5, 2011, the Chief Operating Officer (COO) issued a memorandum to all personnel involved in radiography operations associated with compliance of the ICs. Employees were required to acknowledge receipt of the memorandum. All employees had acknowledged receipt by August 15, 2011. A copy of the email the COO sent to the employees and a blank acknowledgement form were submitted via letter dated August 15, 2011 (ML11234A429). The NRC considers this action closed.

Commitment 2

Acuren site radiation safety officers (or other personnel independent of radiographers) will ensure by direct observation that each Acuren radiography truck (either in use or available for use nationwide) has an operable alarm and that each truck has the ability to provide two independent physical controls to secure licensed material. These audits of the radiography trucks will be conducted as follows:

- a. By August 15, 2011, Acuren site radiation safety officers (or other personnel independent of radiographers) will complete the initial round of audits.
- b. After these initial audits the site radiation safety officer (or other personnel independent of radiographers) will continue conducting these direct-observation audits for each Acuren radiography truck on a calendar quarterly basis.
- c. If a site radiation safety officer identified a noncompliance with the ICs requirements, the site radiation safety officer will restore compliance immediately and will inform the radiation safety director within 3 days.

- d. Acuren management will evaluate the audit results and may increase the frequency of these audits to ensure that corrective actions are effective and lasting.
- e. Copies of the results of the initial and quarterly audits will be documented and provided to the COO and the radiation safety director within 10 days of completion of the audit.
- f. Records of these audits will be retained for a minimum of 3 years from the date of performance. These records will be maintained at the licensee's facility located at 101 Underwood Road, Building J4, La Porte, Texas, 77571. These records will be made available to the NRC upon request.

Actions related to Commitment 2

In a letter dated August 15, 2011 (MI11234A429), the licensee indicated that the initial audits were completed, the audits would continue on a quarterly basis, and results would be reported to the radiation safety director. In a letter dated September 30, 2011 (ML1277A256), Acuren indicated that the site RSO had begun conducting quarterly audits. During the inspection conducted on September 19, 2012, the inspector was able to confirm that the audits are still being conducted and documented and results are transmitted to the radiation safety director. Audits and findings are captured on a Quick Base internet based data system and are set up to send email notification to the radiation safety director when an audit is completed and uploaded to the website. A spot check of the audits confirmed that items of noncompliance are either resolved or the equipment is removed from service until the issue can be resolved. Email notifications are also sent to management, such as the COO who reviews the audit information. Records (via the internet database system) were available for review at the La Porte, Texas, office. The NRC considers this action closed.

Commitment 3

By August 15, 2011, Acuren will complete the development of an online refresher training course that will train employees on the alarm functions of each vehicle and the requirements to secure radiographic exposure devices as required by NRC regulations.

Actions related to Commitment 3

In a letter dated August 15, 2011 (MI11234A429), the licensee indicated that the development of online refresher training was completed. The training modules were completed on July 29th. The NRC considers this action closed.

Commitment 4

By September 30, 2011, a company-wide online refresher training course will be completed by all Acuren radiographers and radiographer's assistants.

Actions related to Commitment 4

Online training for radiographers and radiographer's assistants was 95% complete as of September 6, 2011, and documented as complete in a September 30, 2011, letter from the licensee (ML1277A256).

Training was verified as being complete during the recent inspection. The NRC considers this action closed.

Commitment 5

Acuren will have third-party consultants independently perform random audits of radiography crews. Audits will include ensuring compliance with the ICs requirements.

- a. The consultant will conduct 60 audits in 6 months and when possible the consultant will not announce the audits in advance. Each audit will include a review of one or more crews associated with a particular field office or storage facility.
- b. By August 15, 2011, Acuren will provide a copy of the audit checklist or audit plan to the Director, Division of Nuclear Materials Safety, US Nuclear Regulatory Commission, Region IV.
- c. If the independent auditor identified noncompliance(s) with the ICs requirements, the auditor will notify the site radiation safety officer or the radiation safety director immediately following the audit of the crew. The licensee will take actions to immediately restore compliance. The radiation safety director will be informed of the identified noncompliance within 3 days.
- d. Audits will be documented and copies of the audits will be provided to the Acuren COO and the radiation safety director within 10 days of the completion of the audit.
- e. Records of these audits will be retained for a minimum of 3 years from the date of the audit. These records will be maintained at the licensee's facility at 101 Underwood, Building J4, La Porte, Texas. These records will be made available to the NRC for inspection if requested.
- f. By February 28, 2012, Acuren will evaluate the results of these independent audits along with the results of other corrective actions and may adjust the frequency of the independent audits. By March 31, 2012, Acuren will inform the NRC, in writing, of any changes to the

audits and justification for the change. The written correspondence to the NRC will be addressed to the Director, Division of Nuclear Materials Safety.

Actions related to Commitment 5

- a. Independent audits were initiated in early August. Twenty-four audits were completed as of September 6, 2011, and all 60 audits were completed as stated in a letter from the licensee provided on March 30, 2012 (ML12097A221).
- b. A copy of the checklist was provided to the NRC as part of the August 15, 2011, submittal (ML11234A429)
- c. Third-party audits are provided via hard copy to the site RSO at the end of the audit, and site RSOs are responsible for entering the audit results into Quick Base. Spot checks of audit-identified noncompliances were either corrected immediately or equipment was put out of service until the issue could be addressed.
- d. Copies were provided to the radiation safety directors and Acuren management (COO and Safety Manager) via email notifications that information had been added to Quick Base. Hard copies were provided to the radiation safety directors.
- e. Records were available for review via Quick Base or hard copy at the La Porte office.
- f. As indicated in a letter dated March 30, 2012 (ML12097A221), Acuren elected to continue the third-party audits.

The NRC considers these actions closed.

Commitment 6

By October 16, 2011, Acuren will complete an in-depth root cause analysis to determine the causes of the failures to meet the security requirements for radiographic exposure devices containing licensed materials at Acuren's field offices and temporary job sites as well as while transporting licensed materials. Acuren's root cause analysis will consider violations of the ICs that have been identified by Acuren, the NRC, and Agreement States in the past 2 years. A copy of the analysis will be provided to the NRC Director, Division of Nuclear Materials Safety, Region IV, within 7 days of completion.

By December 9, 2011, Acuren will develop a corrective action plan based on the results of its root cause analysis and send a copy to the NRC Director, Division of Nuclear Materials Safety, Region IV.

Actions related to Commitment 6

In a letter dated December 7, 2011 (MI11342A222), Acuren Inspection provided a copy of the root cause analysis conducted and the corrective action plan associated with the root cause analysis. The corrective action plan was in place and was being implemented. The NRC considers these actions closed.