



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

January 28, 2013

Robert Jefferson  
Radiation Safety Officer  
Acuren USA  
P.O. Box 340122  
Prudhoe Bay, AK 99734

SUBJECT: NRC INSPECTION REPORT 030-38596/2012-002 AND NOTICE OF VIOLATION

Dear Mr. Jefferson:

This letter refers to the in-office inspection conducted by Mr. Jason Razo of my staff from October 19, 2012, through January 18, 2013. The purpose of the inspection was to review the circumstances surrounding an event reported by you on October 19, 2012. The event occurred in Prudhoe Bay, Alaska, on October 4, 2012, and involved the inability to immediately retract a sealed source to the shielded position within a radiographic exposure device. During the inspection, the U.S. Nuclear Regulatory Commission (NRC) examined selected procedures and representative records, reviewed reports submitted by the licensee, and discussed the event with you by telephone. This report presents the results of this inspection. The NRC conducted a final telephonic exit briefing with you on January 18, 2013, to discuss the results of the inspection.

The Prudhoe Bay, Alaska, event involved a control cable that was too short for the control drive mechanism in which it was installed. This discrepancy resulted in the end of the control cable becoming jammed in the teeth of the control drive mechanism when the control cable was almost all of the way cranked out, but before the source assembly reached the end of the guide tube and exposure head. The sealed source assembly stopped approximately two feet from the exposure head and was not in a position to be shielded by a collimator. The radiography crew immediately identified that the sealed source assembly was stuck within the guide tube but not in the shielded position within the radiographic exposure device. The crew followed its procedure and contacted a licensee employee that was trained and qualified in sealed source retrieval.

During source retrieval, the control tubes were separated from the control drive mechanism; this action exposed the control cable. The individual trained for source retrieval then manually pulled the control cable until the source assembly returned to the shielded position within the radiographic exposure device.

The maximum dose received by anyone involved in the event was 0.007 rem deep dose equivalent. No members of the public were exposed to excess radiation because of this event. You informed the NRC about the event two weeks later. The NRC has concluded that, except for the delay in the notifying the NRC, your actions were appropriate.

Based on the results of the inspection, the NRC determined that a violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy and categorized at Severity Level IV. The current Enforcement Policy is included on the NRC's Web site at [http://www.nrc.gov/about\\_nrc/regulatory/enforcement/enforce\\_pol.html](http://www.nrc.gov/about_nrc/regulatory/enforcement/enforce_pol.html). The violation involved the failure to report an event to the NRC within 24 hours. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the Notice. The reporting requirement violation is being cited in the Notice because it was identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. For your consideration and convenience, an excerpt from NRC Information Notice 96-28, "Suggested Guidance Relating to Development and Implementation of Corrective Action," is enclosed. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements. In your response, please also address any enhancements or modifications made to sections of your Operating and Emergency Procedures related to control drive mechanism maintenance and training of radiography and management personnel on identifying what is an NRC reportable event.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response, 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>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

R. Jefferson

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Should you have any questions concerning this inspection, please contact Mr. Jason Razo at 817-200-1589 or Mr. Michael Vasquez at 817-200-1130.

Sincerely,

*/RA/*

G. Michael Vasquez, Chief  
Nuclear Materials Safety Branch – A  
Division of Nuclear Materials Safety

Docket: 030-38596  
License: 50-32443-01

Enclosures:

1. Notice of Violation
2. NRC Information Notice 96-28

cc/w encl 1: Clyde E. Pearce, Chief, Radiological  
Health Program, Section of Laboratories,  
State of Alaska

R. Jefferson

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G. Michael Vasquez, Chief  
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01/25/2013	01/28/2013			

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## NOTICE OF VIOLATION

Acuren USA  
Prudhoe Bay, Alaska

Docket: 030-38596  
License: 50-32443-01

During the U.S. Nuclear Regulatory Commission (NRC) inspection conducted from October 19, 2012, through January 18, 2013, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

Title 10 of the *Code of Federal Regulations* (CFR) 30.50(b)(2) requires, in part, that licensees must notify the NRC Operations Center within 24 hours after the discovery of an event involving licensed material in which equipment is disabled or fails to function as designed when: (1) the equipment is required by regulation or license condition to prevent exposures to radiation exceeding regulatory limits; (2) the equipment is required to be available and operable when it is disabled or fails to function; and (3) no redundant equipment is available and operable to perform the required safety function.

Contrary to the above, on October 5, 2012, the licensee failed to notify the NRC Operations Center within 24 hours after the discovery of an event involving licensed material in which equipment is disabled or fails to function as designed when: (1) the equipment is required by regulation or license condition to prevent exposures to radiation exceeding regulatory limits; (2) the equipment is required to be available and operable when it is disabled or fails to function; and (3) no redundant equipment is available and operable to perform the required safety function. Specifically, the licensee was unable to retract a sealed source of a radiographic exposure device into the shielded position because the control cable jammed inside the control drive mechanism. The licensee failed to notify the NRC Operations Center about this event until October 19, 2012, a period greater than 24 hours after the discovery of the event.

This is a Severity Level IV violation (Section 6.9).

Pursuant to the provisions of 10 CFR 2.201, Acuren USA is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; NRC Inspection Report 030-38596/2012-002," and should include for the violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Enclosure 1

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response 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> to the extent possible, it 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, then 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 material, 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). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 28th day of January 2013.