



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

December 2, 2013

Acuren Inspection, Inc.
ADBA/WIT Pipeline
ATTN: Gayle J. Staton
Radiation Safety Officer
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La Porte, Texas 77571

Acuren Inspection, Inc.
ADBA/WIT Pipeline
ATTN: Chris Dixon
Radiation Safety Officer
502 W. Crescentville Road
Cincinnati, Ohio 45246

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

The Nuclear Regulatory Commission (NRC) has initiated the technical review of Acuren Inspection, Inc., letter dated August 29, 2013, requesting an exemption from the requirements described in 10 CFR 34.20(a)(1) to allow for the use of a tooling device during industrial radiography operations. Provide the following information at your earliest convenience for NRC review. Make reference to mail control number 582367 when providing your response.

Please contact Lymari Sepulveda, General Engineer, at 301-415-5619 to schedule a telephone conference call to discuss this request for additional information before providing a response to this letter.

1. Content of application
 - 1.1. Provide legible drawings for Attachments 1-4.
 - 1.2. The procedure provided in your application is under the heading "Babcock & Wilcox Nuclear Operation Group, Inc." Please explain how this is applicable to Acuren Inspection.
 - 1.3. In your letter you indicated that the source to be use is a Co-60 Model 943. Meanwhile, your procedures indicated the use of Se-75 and Ir-192. Please provide the model number and manufacturer for sources containing Selenium 75 and Iridium 192. Also, provide the manufacturer's name of the sealed source model 943.

- 1.4. In your procedure you indicated the use of QSA Global radiographic camera Model 880. Please confirm that you will use QSA Global radiographic camera Model 880. Please note that the source model 943 is not authorized for use in QSA Global radiographic camera Model 880. Please clarify whether this would be a special use. If that is the case, please provide safety related information regarding the use of the camera with sealed source model 943.
- 1.5. Drawing No. PD44488 shows a source guide tube designated for "WG-003". Please provide the following information
 - 1.5.1. Please explain the role of the "spring pin" (Part AA/D) and provide a drawing of the part.
 - 1.5.2. Please clarify the designation "WG-003"
 - 1.5.3. Attachment 1 shows another design of a positioning tool; provide an engineering drawing similar to Drawing No. PD44488, and provide information about the intended use of this part.
 - 1.5.4. Confirm whether Attachment 2 is the same tool as shown on Drawing No. PD44488.
- 1.6. Describe how the tools shown in Attachments 3 and 4 will be held in place.
- 1.7. Confirm whether the cylinder rod referenced in Sections 4.3.1, 4.3.2, and 4.3.5 is the component which is shown as Part AB on Drawing No. PD44488.
- 1.8. Clarify which weld is to be checked in Section 4.3.1 of the operating procedures.
2. Tube design
 - 2.1. In the operating procedures provided in your application, makes reference to two configurations: tube-to-tubesheet and tubesheet-to-shell welds. Please provide information to clarify the following:
 - 2.1.1. Please explain the difference between the two configurations. Please indicate if these configurations are two different designs of special guide tubes. If so, please provide a list of the differences, preferably in a table, of materials of constructions, dimensions and installation.
 - 2.1.2. Please specify if the configuration Tube-to-tubesheet will be exclusively use with Selenium 75 and Iridium 192 sources (See Section 4.2 in the Procedures) and the configuration tubesheet-to-shell will be exclusively use with welds will use Cobalt 60 (See Section 4.3 in the procedures).
 - 2.1.3. Please provide a detail description of the special guide tube/s.
 - 2.1.4. Please provide the intended use of the special guide tube/s.

2.1.5. Please provide the working life of the special guide tube/s.

2.1.6. Please indicate the manufacturer of the special guide tube/s.

2.1.7. Please indicate if the special guide tube/s is custom built for use by Acuren Inspection, Inc.

2.1.8. Please indicate if the special guide tube has a model number designation. If so, please provide the model number or numbers for the special guide tubes.

2.1.9. Please describe how the guide tube is connected to the special guide tube.

3. Operating Procedure

3.1. The operating procedure indicates that utilization of these devices is limited to the specific applications described in this procedure. Please indicate what the specific applications are.

3.2. Section 3.4.1 of the Operating Procedure 10, Part III directs the radiographer to check the special guide tube in accordance with Part III, Operating Procedure 7, Section 2.3.4 and 2.3.5. Please note that this procedure was not included with the application. Please provide Part III, Operating Procedure 7.

3.3. Please provide the procedures to be used in case of an emergency.

4. Prototype Testing

4.1. Please provide Prototype Testing results and procedures for normal use and likely accident conditions. Please note that operational history of the product, comparison to similar products, or an engineering analysis may be also used to evaluate the integrity of the special tool.

4.2. Please indicate if cable runs with dummy sources were performed to make sure the source does not get stuck inside the special tool or cause the source to be disconnected.

Acuren Inspection, Inc.

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

Thank you for your cooperation.

Sincerely,

/RA/

Roberto J. Torres, Senior Health Physicist
Nuclear Materials Safety Branch B

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