



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

May 30, 2014

EA-14-062

Mr. John Lockwood, President
Acuren USA
43 Arch Street
Greenwich, CT 06830

SUBJECT: RESPONSE TO CONFIRMATORY ACTION LETTER

Dear Mr. Lockwood:

This letter is to acknowledge receipt of Acuren USA's response dated May 14, 2014, (ML14136A042) to the Nuclear Regulatory Commission's (NRC) Confirmatory Action Letter (CAL) issued on April 24, 2014 (ML14114A765). The CAL was based on inspection observations on April 10, 2014, at your company's field station in Kenai, Alaska. The NRC subsequently conducted a reactive inspection on May 5-8, 2014, at your Anchorage and Kenai field stations in Alaska. Based on our review of your May 14 response and information developed during the above noted inspections, the NRC requests clarification on several portions of your response to the CAL. The items requiring clarification were discussed with you and members of your staff during a telephone call on May 23, 2014, and are described below.

In Item 1 of the CAL, Acuren USA was asked to provide in writing a description of the actions that have been taken, or will be taken, to ensure that future NRC licensed activities at the Kenai field station will not result in any member of the public receiving a dose in excess of regulatory limits. In your response to the CAL, you stated that radiographic operations had been suspended and that future radiographic operations will take place in the laydown area. The letter did not state how radiographic operations would be performed nor the specific actions you have taken or will take to ensure that no member of the public will receive doses in excess of regulatory limits. For example, the inspection team was informed that you had conducted additional training for your managers, radiographers, and assistant radiographers, but your response did not describe the additional training. Also, our understanding is that you will enhance surveillance of the area and barriers, yet the response did not describe such additional actions.

We also noted that the facility layout/diagram attached as part of Schedule A to your response is not accurate, this was discussed with your staff during the inspection on May 5-7, 2014. The diagram should be updated and drawn to scale.

In Item 2 of the CAL, Acuren USA was asked to provide, in writing, the calculations and evaluations necessary to determine whether members of the public received doses in excess of NRC limits at its Kenai station. It is unclear how Acuren USA used the information provided in

the calculations table in Schedule A to arrive at its conclusion that members of the public did not receive doses in excess of NRC limits. In addition, the team could not reproduce the numbers in Schedule A. Please resubmit the calculations, along with a description of the assumptions made, how those calculations were derived, whether actual measurements were used in lieu of calculated dose estimates, and any other information the team needs to confirm your calculations. Include a clear description of the columns and the units for the numbers. In addition, please explain the basis for your conclusion that doses to members of the public from radiography performed on April 10, 2014, were within NRC limits for members of the public that could have occupied rooms within the building complex or areas near the outer perimeter of the shop where radiography was performed. For example, the NRC inspection team can only surmise that your conclusions were based, at least in part, on interviews with building occupants and interviews with your staff in order to estimate the occupancy factors outside the shop and on radiation measurements taken in the area. However, your letter did not explain these points. Also, there was no description for where the radiation boundaries (the 2 millirem in any hour and the 100 millirem in any hour) should have been placed.

Lastly, in Item 3 of the CAL, Acuren USA was asked to provide a copy of evaluations of its field stations and temporary job sites to demonstrate that no member of the public could receive radiation doses in excess of regulatory limits. Although your response to the CAL stated that Acuren USA concluded that members of the public did not receive doses in excess of NRC limits at temporary job sites due to past licensed activities, your letter did not state how this conclusion was reached. Please provide additional information about the facts gathered and your evaluations to support this conclusion. For example, explain how your evaluations were performed, details of how radiographic operations at the Anchorage field station and temporary job sites were performed with sufficient information to reasonably demonstrate that activities at these locations did not result in doses to members of the public in excess of NRC dose limits. You should consider including information gathered during interviews of radiographers and the reasons they provided to demonstrate that no dose limits were exceeded.

We request that your supplemental response be provided to the NRC by June 13, 2014. Once we receive your supplemental response, we will continue our review of your evaluations. The results of our review of your responses to the CAL and the findings of our inspection will be discussed with you during an exit briefing which will be scheduled in the future.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice and Procedure," a copy of this letter and 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). ADAMS is 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, proprietary, security-related 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

J. Lockwood

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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 you have any questions concerning this matter please contact Mr. Michael Vasquez, Chief, Nuclear Materials Safety, Branch A at 817-200-1130.

Sincerely,

/RA/

Linda L. Howell, Acting Director
Division of Nuclear Materials Safety

Docket No. 030-38596
License No. 50-32443-01

cc:

Mr. Dennis Lee, General Manager
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Mr. Clyde E. Pearce, Chief
Radiological Health Program
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5455 Dr. Martin Luther King, Jr., Ave.
Anchorage, AK 99507-1270

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 you have any questions concerning this matter please contact Mr. Michael Vasquez, Chief, Nuclear Materials Safety, Branch A at 817-200-1130.

Sincerely,

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Linda L. Howell, Acting Director
Division of Nuclear Materials Safety

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Letter to Mr. John Lockwood from Linda L. Howell, dated May 30, 2014

SUBJECT: RESPONSE TO CONFIRMATORY ACTION LETTER

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