

A SUPERIOR ENERGY SERVICES COMPANY

May 27, 2014

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2014001

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**Via Certified Mail, Return Receipt Requested, No. Insert receipt # 70123050000184233096**

United States Nuclear Regulatory Commission Region I  
2100 Renaissance Blvd., Suite 100  
King of Prussia, PA 19406-2713

RE: Reply to a Notice of Violation  
NRC Inspection Report No. 03021037/20114001  
AWS, Inc. DBA Titan Wireline

Dear Mr. Welling:

This correspondence is in response to the Nuclear Regulatory Commission's (NRC) letter dated April 22, 2014 regarding alleged violations identified during your site inspection March 18, 2014. With respect to concerns identified in the report captioned above Titan Wireline Services ("Titan Wireline") will put into practice the following corrective actions.

**Responses to Alleged Violations Cited:**

- A. 10 CFR 39.61(c) requires that the licensee shall provide safety reviews for logging supervisors and logging assistants at least once during each calendar year.

*Cause: This issue was likely caused by lack of management control and auditing of process and a lack of knowledge of logging supervisors and assistants of procedural radiation license requirements.*

*Corrective Action: Safety reviews for all logging supervisors and assistants will be conducted according to 10 CFR 39.61(c) at least once during each calendar year. The procedure requiring safety reviews for logging supervisors and assistants is provided in Attachment 1 for your review.*

*The target date for completion of this activity is July 1, 2014.*

- B. 10 CFR 30.34(c) requires, in part, that each person licensed by the commission pursuant to the regulations in Part 30 shall confine his possession and use of the byproduct material to the locations and purposes authorized in the license.

NRC License No. 37-23410-01, Condition No. 18 states, in part, that the licensee will conduct its program in accordance with the statements, representations, and procedures contained in the

documents, including any enclosures listed below, including the license application dated March 31, 2004. Section 10.5.A of the license application states that "Annual unannounced inspections of all logging supervisors will be conducted by the RSO and or ARSO to determine compliance with regulations and written operating and safety procedures."

*Cause: This issue was likely resulted from a lack of management control and auditing of process, and lack of knowledge of procedural radiation license requirements by various employees.*

*Corrective Action: An annual unannounced compliance inspection of all logging supervisors will be conducted by the Company's RSO. The purpose of the assessment is to identify any gaps in our radiation protection program and implement the necessary corrective actions to upgrade our procedures to ensure compliance with applicable radiation control standards contained in 10CFR 30.34(c) and our NRC license Section 10.5A. A copy of the compliance inspection procedure is provided in Attachment 2 for your review.*

*The target date for completion of this activity is June 30, 2014.*

- C. 10 CFR 39.61(d) states, in part, that the licensee shall maintain a record on each logging supervisors and logging assistants training and annual safety review. The training records must include copies of written tests and dates of oral tests given after July 14, 1987. The training records must be retained until three years following the termination of employment. Records of annual safety reviews must list the topics discussed and be retained for three years.

*Cause: A lack of management control and auditing of process is the likely cause of this issue.*

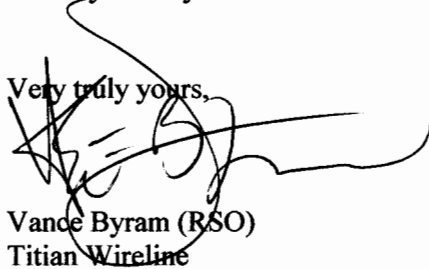
*Corrective Action: Records of each logging supervisors and logging assistants training, annual safety review, and tests will be maintained according to 10 CFR 39.61(d). The procedure requiring documentation of safety training for logging supervisors and assistants is described in the training procedure provided in Attachment 1.*

*The target date for completion of this activity is July 1, 2014.*

It is the intention of Titan Wireline Services to demonstrate through our actions that the issues described in the Notice of Violation have been treated with the appropriate level of sincerity and thoroughness as to avoid reoccurrence of similar events in the future. Titan Wireline is committed to regulatory compliance at our facility. If you require any additional or supporting information with respect to any of the issues described in this letter, please do not hesitate to contact the undersigned.

Thank you for your consideration regarding this matter

Very truly yours,



Vance Byram (RSO)  
Titan Wireline  
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Elderton, PA 15736