



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

June 16, 2014

Docket No. 03021037

License No. 37-23410-01

Michael Daquilante
Regional Manager
AWS, Inc. d/b/a Titan Wireline
P.O. Box 286
Elderton, PA 15736

SUBJECT: NRC INSPECTION REPORT NO. 03021037/2014001, AWS, INC., DBA TITAN WIRELINE, REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Daquilante:

This letter refers to your May 27, 2014, correspondence, in response to our April 22, 2014, letter and Notice of Violation (NOV). Your letter has been reviewed and additional information is still needed concerning the corrective actions you have taken, and plan to take, in response to the violations noted in the NOV. The following items were identified and additional information is needed:

1. Violation A was regarding AWS, Inc.'s failure to provide safety reviews for logging supervisors and logging assistants at least once during each calendar year as required by 10 CFR 39.61(c).

Your response to violation A stated that the 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. You stated that your corrective action was that 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.

Our review noted the corrective action you provided did not address the corrective steps that will be taken to avoid further violations, as requested in the NOV. You stated that a procedure that requires safety reviews was included, but this did not appear to be submitted. Additionally, you did not state if this procedure contained any changes from your previous program, or how this would prevent reoccurrence. Please provide a complete response to these items for Violation A.

2. Violation B was regarding AWS, Inc.'s failure to conduct annual unannounced inspections of all logging supervisors as required by Condition No.18 of your NRC license.

Your response to violation B stated that the issue likely resulted from a lack of management control and auditing of process and lack of knowledge of procedural radiation license requirements by various employees. Your corrective action stated that an annual unannounced compliance inspection of all logging supervisors will be conducted by your radiation safety officer.

Our review noted that the corrective action you provided did not address the corrective steps that will be taken to avoid further violations, as requested in the NOV. You stated that the compliance inspection procedure was included, but this did not appear to have been submitted. Additionally, you did not state if this procedure contained any changes from your previous program, or how this would prevent reoccurrence. Please provide a complete response to these items for Violation B.

3. Violation C was regarding AWS, Inc.'s failure to maintain a record of each logging supervisors and assistant's training and annual safety review's as required by 10 CFR 39.61(d).

Your response to violation C stated that the cause was a lack of management control and auditing of process. Your corrective action stated that records of each logging supervisors and logging assistants training, annual safety review and tests will be maintained according to 10 CFR 39.61(d).

Our review noted that the corrective action you provided did not address the corrective steps that will be taken to avoid further violations, as requested in the NOV. You stated that the training procedure was included, but this did not appear to have been submitted. Additionally, you did not state if this procedure contained any changes from your previous program, or how this would prevent reoccurrence. Please provide a complete response to these items for Violation C.

Please submit to this office, **within seven (7) days** of receipt of this letter, a written statement containing: (1) the reason for the violation, or, if contested, the basis for disputing the violation; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken to avoid further violations; and (4) the date when full compliance will be achieved. This reply should be clearly marked as a "Reply to a Notice of Violation."

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure(s), and your response, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC document system (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. **To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.**

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's website at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets for the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Please contact Scott Wilson at 610-337-5136 if you have any questions regarding this matter.

Sincerely,

Original signed by Blake Welling

Blake Welling, Chief
Commercial, Industrial, R&D and Academic Branch
Division of Nuclear Materials Safety

cc: Vance Byram, Radiation Safety Officer
Commonwealth of Pennsylvania

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Commonwealth of Pennsylvania

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