



July 02, 2014

L1  
37-23410-01  
03021037  
2014001

REC-61 0709:14 PM 07/07

**Via e-mail and Certified Mail, Return Receipt Requested, No. 7014 0150 0002 0442 2833**

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 June 16, 2014 and received by us on July 02, 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.

*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 2014 safety review has been accomplished for all logging supervisors and assistants. Copies of the safety training class rosters are enclosed as an attachment.*

*An electronic compliance matrix has been created to track and ensure all future safety reviews are conducted according to our NRC license requirement. A copy of the referenced matrix is enclosed as an attachment.*

*The target date for completion of this activity is July 31, 2014.*

NMSS/RGNI MATERIALS-004

- 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."

Corrective Action: Annual unannounced compliance inspection of all authorized users will be conducted by the Company's RSO or ARSO. 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 10 CFR 30.34(c) and our NRC license Section 10.5A. A copy of the most recent compliance inspection is enclosed as an attachment.

An electronic compliance matrix has been created to track and ensure that annual compliance inspections are conducted in the future according to our NRC license requirements. A copy of the referenced matrix is enclosed as an attachment.

The target date for completion of this activity is July 31, 2014 or next scheduled job.

- 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.

Corrective Action: Records of each logging supervisors and logging assistants training, annual safety review, and tests referenced in our response in item A are on file and will be maintained according to 10 CFR 39.61(d).

An electronic compliance matrix has been created to track and ensure document that all logging supervisors and assistant logging supervisors future safety reviews are tracked and conducted according to our NRC license requirements. A copy of the referenced matrix is enclosed as an attachment.

The target date for completion of this activity is July 9, 2014.

The individuals responsible for overall management of the business activities will receive awareness training that will cover radiation safety and the company's duties and responsibilities under our NRC license No. 37-23410-01 no later than July 15, 2014. Such training will be conducted by the RSO or ARSO for Warrior Energy Services Corporation License # 17-17707-

01 (parent company of Titan Wireline). The RSO and other individuals responsible for managing our radiation safety program according to the terms and conditions of our NRC license have received appropriate training. Copies of the radiological training certificates are provided as an attachment. A complete list of the employees who have or will receive the training according to these conditions is provided below.

Employee Name	Title	Training	Date	Training Provider
Vance Byram	RSO	RSO Refresher		Applied Health Physics
Todd Riggle,	Operations Supervisor	RSO		Applied Health Physics
Robert Weiss	Operations Supervisor	Awareness Training		Warrior SRSO
Mark Boyer	Technician	RSO		Applied Health Physics
Rick McKee	Safety Coordinator	RSO Refresher		Applied Health Physics
Michael Daquilante	Regional Manager	Awareness Training		Warrior RSO
Timothy Rearick	Operations Manager	Awareness Training		Warrior RSO

Future plans as they exist today are to allow the U.S. Nuclear Regulatory Commission's License #37-23410-01 to expire on July 31, 2014. The material under the jurisdiction of this license will be supported and transferred to the U.S. Nuclear Regulatory Commission's License #17-17707-01. The current Radiation Safety Officer (RSO) listed on License #37-23410-01, Vance Byram, will not assume the duties of RSO under the License #17-17707-01.

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,



Michael Daquilante  
Regional Manager  
Titan Wireline  
PO Box 286  
Elderton, PA 15736

# AWS / Titan Wireline Radiation History Review Matrix

Employee Name		Active	Title	2014 Annual Review				RSO Training	RSO Refresher
				2014 User List	2014 Job Usage	2014 Annual Audit	2014 Radiation Safety Training		
Mark	Boyer		Technician						
Vance	Byram		RSO						
Michael	Daquilante		Regional Mgr						
Norman Rick	McKee		Safety Coordinator						
Timothy	Rearick		Ops. Mgr.						
Todd	Riggle		Ops. Supv.						
Robert	Weiss		Ops. Supv.						

Legend



*[Handwritten signature]*

**CLASS ROSTER - SAFETY REVIEWS  
LOGGING SUPERVISORS AND ASSISTANTS**

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## STANDARD CORPORATE FORM

SCF-003

### TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety

Date: 6/5/14

Instructor Name & Company: Rick McKee WESC

Location: 1300-200

	Employee Name	Employee # or Last 4 of SSN	Division or Sub-Name	Employee Signature	Completed
1	Josh Barden	[REDACTED]	1300-200	Josh Barden	6/5/14
2	Christopher Hartman	[REDACTED]	1300-200	Chris Hartman	
3	Mark Elgin	[REDACTED]	1300-200	Mark Elgin	
4	Randy Redding	[REDACTED]	1300-200	Randy Redding	
5	Robert Lyle	[REDACTED]	1300-200	Robert Lyle	
6	Dale Hough	[REDACTED]	1300-200	Dale Hough	
7	Angela Swartz	[REDACTED]	1300-200	Angela Swartz	6/5/14
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

COURSE START TIME: 2:15pm COURSE FINISH TIME: 2:45pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee  
Instructor Signature

6/5/14  
Date

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# STANDARD CORPORATE FORM

SCF-003

## TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety Date: 6/5/14  
Instructor Name & Company: Rick McKee WESC Location: 1300-200

	Employee Name	Employee # or Last 4 of SSN	Division or Sub. Name	Employee Signature	Completed
1	Barry McIlwain	[REDACTED]	1300-200	[Signature]	6/5/14
2	Lane Fitzgerald	[REDACTED]	1300-200	[Signature]	
3	David C. Brierer	[REDACTED]	1300-200	[Signature]	
4	Josh Clark	[REDACTED]	1300-200	[Signature]	
5	Dan Handley	[REDACTED]	1300-200	[Signature]	
6	IVSON MISH	[REDACTED]	1300-200	[Signature]	
7	JAMES MERRIMAN	[REDACTED]	1300-200	[Signature]	
8	Serry Lichtensin	[REDACTED]	1300-200	[Signature]	6/5/14
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

COURSE START TIME: 1:30pm COURSE FINISH TIME: 2:00pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee  
Instructor Signature

6/5/14  
Date

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## STANDARD CORPORATE FORM

SCF-003

### TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety

Date: 6/5/14

Instructor Name & Company: Rick McKee WESC

Location: 1300-200

	Employee Name	Employee ID Tag # or SSN	Division or Sub Name	Employee Signature	Completed
1	Josh Barden		1300-200	John Barden	6/5/14
2	Christopher Hartman		1300-200	Chris Hartman	
3	Mark Elgin		1300-200	Mark Elgin	
4	Randy R. Higgins		1300-200	Randy R. Higgins	
5	Robert Wells		1300-200	Robert Wells	
6	Dale Hargy		1300-200	Dale Hargy	
7	Angela Swartz		1300-200	Angela Swartz	6/5/14
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					

COURSE START TIME: 2:15 pm COURSE FINISH TIME: 2:45 pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee  
Instructor Signature

6/5/14  
Date



## COMPLIANCE MATRIX

AWS Titan Compliance Matrix

Employee Name		Active	Title	2014						2015					
				2014 User List	2014 Job Usage	2014 Annual Audit	2014 Radiation Safety Training	RSO Training	RSO Refresher	2015 User List	2015 Job Usage	2015 Annual Audit	2015 Radiation Safety Training	RSO Training	RSO Refresher
First Name	Last Name														
Cory	Adams														
Ryan	Arbaugh		Ops. Supv.												
Jeffery	Armstrong		Operator												
Joshua	Barden		Skill Labor												
David	Bierer		Skill Labor												
Joseph	Boyle														
Mark	Boyer		Technician												
Vance	Byram		RSO												
Nicholas	Carney														
Joshua	Clark		Operator												
Russell	Clark, Jr.		Operator												
Richard	Cramer														
Michael	Daquilante		Regional Mgr												
Mark	Elgin		Shop Foreman												
Keith	Fleming														
Richard	Fitzgerald, Jr.		Ops. Supv.												
Lane	Fitzgerald		Operator												
William	Gett														
Richard D	Haag		Skill Labor												
Christopher	Harkleroad		Shop Labor												
Justin	Hartzell		Operator												
Daniel	Headley		Operator												
Brian	Huffman		Ops. Supv.												
Christopher	Klonowski														
John	King		Operator												
Jerry	Lichtenfels		Skill Labor												
Shawn	Lockard		Ops. Supv.												
Randy	Lukehart														
Matthew	McCormick		Operator												
Barry	McIlwain		Skill Labor												
Lanny	McLain														
Norman Rick	McKee		Safety Coordinator												
James	Merryman		Skill Labor												
Cody	Meyer		Operator												
William	Metro														
Tyson	Mish		Operator												
Timothy	Monoskey		Ops. Supv.												
Jeffrey	Nickle														
W.	Orr														
Joseph	Plaskunak														
J	Pough														

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AWS Titan Compliance Matrix

Employee Name		Active	Title	2014						2015					
				2014 User List	2014 Job Usage	2014 Annual Audit	2014 Radiation Safety Training	RSO Training	RSO Refresher	2015 User List	2015 Job Usage	2015 Annual Audit	2015 Radiation Safety Training	RSO Training	RSO Refresher
Timothy	Rearick		Ops. Mgr.												
Randall	Reddinger		Skill Labor												
Aaron	Renwick		Ops. Supv.												
Stanley	Riggle														
Todd	Riggle		Ops. Supv.												
Brandon	Rosenberger														
Larry	Ross														
Kevin	Rupert		Ops. Supv.												
Rod	Seita		Operator												
Evan	Sharrer		Operator												
Joshua	Simmons		Operator												
Terry	Streightif														
Angela	Swartz		Administrative												
Larry	Swartz														
Aaron	Thomas		Ops. Supv.												
Steven	Townsend		Ops. Supv.												
Robert	Weiss		Ops. Supv.												
Randall	Williams		Operator												
James	Woodside		Operator												
Jared	Woodside		Operator												

Legend

Within Requirements  
 Outside of Requirements

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# COMPLIANCE INSPECTION



**AWS Inc.**

**ANNUAL RADIATION SAFETY AUDIT  
May 2014**

**LICENSE REVIEW:**

U.S. Nuclear Regulatory Commission License No. 37-23410-01  
Amendment No. 11 - February 9, 2009  
Expiration Date: July 31, 2014

PA Department of Environmental Protection License No. PA-1032  
Amendment No. 2 - February 9, 2009  
Expiration Date: July 31, 2014

PA Department of Environmental Protection Certification No. PA-G0119  
Amendment New - May 27, 2009  
Renewal Date: June 30, 2010 - Discontinued

NY Department of Health License No. C3250  
Amendment No.3 - May 1, 2011  
Expiration Date: November 30, 2013 - Will Discontinue

Ohio Department of Health Bureau of Radiation Protection  
2010 RECIPROCITY AUTHORIZATION 00004 PA 1011  
January 1 through December 31, 2010 - Discontinued

**PREVIOUS AUDITS:**

All items were completed

## **INSPECTIONS:**

**U.S. Nuclear Regulatory Commission - November 28, 2007**  
No violations identified - previous violation(s) closed.

**NY Department of Health - January, 2008**  
No items of noncompliance were found.

**PA DEP Bureau of Radiation - June, 2009**  
No items of noncompliance were found.

**OHIO Department of Health Bureau of Radiation Protection- March 2010**  
No Items of noncompliance were found.

**Pa DEP Bureau of Radiation – September 21, 2011 by Celia Rajkovich**  
Recommendations:  
Ensure that gauges are mounted and posted in a manner that ensures ALARA  
Ensure that gauges are properly labeled and marked for transportation  
Recommendations were followed and a binder was made up for each Vehicle which include shipping papers, leak tests, NRC & PA DEP licenses

**U.S. Nuclear Regulatory Commission- January, 2011**  
No items of noncompliance were found.

**PA DEP Bureau of Radiation – May 2012 by Celia Rajkovich**  
Labels to be laminated and attached to densometers on trucks.  
Shutters are closed and locked in storage during transporting.

**U.S. Nuclear Regulatory Commission- March, 2014 by Scott Wilson**  
The following items of noncompliance were found:

- 1: Failure to maintain logging supervisor and assistant training records
- 2: Failure to provide safety reviews annually for logging supervisors and assistants
- 3: Failure to conduct annual unannounced inspections of all logging supervisors

**LICENSED MATERIAL SECURITY:**

Quantities of Concern requirements completed.

**OPERATING PROCEDURES:**

Current and in-place.

**EMERGENCY PROCEDURES:**

Current and in-place.

**RADIATION GENERATING DEVICES:**

None possessed.

**INVENTORY OF SPECIFICALLY LICENSED MATERIALS:**

See attached physical inventory.

**GENERALLY LICENSED DEVICES:**

See attached list of devices.

**RADIATION SURVEYS OF RESTRICTED AREAS:**

Surveys completed for transport vehicles and logging tools.

**RADIATION SURVEY METERS:**

See attached calibration documentation.

### **LEAK TESTING:**

Leak testing completed every six months.  
See attached leak test documentation.

### **PERSONNEL MONITORING PROGRAM:**

Quarterly exposure records are reviewed by badged workers with any exposure during the quarter. Records are signed and placed in the files.

Annual exposure records are not currently provided for badged workers. A request for individual reports has been sent to RADETCO.

The badged worker group is reviewed on a quarterly basis to identify those personnel that are assigned duties that include working with radioactive sources.

### **ANNUAL REVIEW OF AUTHORIZED USERS:**

Last reviews dated 2013.

### **DISPOSAL OF RADIOACTIVE MATERIALS:**

No disposal of licensed material has taken place since last annual review.

### **SHIPPING OF RADIOACTIVE MATERIALS:**

Shipping papers revised to comply with U.S. Department of Transportation requirements.

### **FACILITY INSPECTION OF RADIOGRAPHY AREAS:**

Required signs and postings noted. Security in place for radioactive materials.



## **FINDINGS:**

The review of the Titan Wireline Services Radiation Safety Program was conducted by Vance Byram, RSO, on May 2, 2014. The overall assessment of Radiation Safety at Appalachian Well Services is satisfactory.

The findings and recommendations as identified by this review will be addressed in a timely manner.

## **Corrective Actions:**

- 14 - 01: Have logging supervisors and assistants attend RSO training, Two of the supervisors and assistants have taken the RSO on May 15, 2014 with the others to be enrolled in the fall class. Radiation Safety training to all other employees to be conducted on an annual basis; in process.**
- 14- 02: Conduct unannounced inspections of logging supervisors on job locations; In process**
- 14 - 03: Conduct annual training on timely basis by using an electronic calendar reminder and a training matrix.**

# **RADIOLOGICAL TRAINING CERTIFICATES**



**Applied HEALTH PHYSICS, LLC**

## **CERTIFICATE OF RADIOLOGICAL TRAINING**

*This is to certify that*

**Mark Boyer**

*has successfully completed*

**24 HOUR RADIATION SAFETY OFFICER TRAINING COURSE  
AND INSTRUCTION AS REQUIRED BY NUREG-1556  
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, LLC  
May 13<sup>th</sup> through May 15<sup>th</sup>, 2014*

  
\_\_\_\_\_  
Todd Y. Mobley, Director, Technical Services

  
\_\_\_\_\_  
Management Review

\_\_\_\_\_  
Date

\_\_\_\_\_  
DOT Subpart H Expiration Date

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WAS RETAINED BY THE NRC



**Applied HEALTH PHYSICS, LLC**

## **CERTIFICATE OF RADIOLOGICAL TRAINING**

*This is to certify that*

**Vance Byram**

*has successfully completed the*

**8-HOUR RADIATION SAFETY OFFICER REFRESHER TRAINING  
AND INSTRUCTION AS REQUIRED BY NUREG-1556  
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, Inc.  
May 20<sup>th</sup>, 2014*

Todd Y. Mobley – Director, Technical Services

Management Review

Date

DOT Subpart H Expiration Date

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WAS RETAINED BY THE NRC



**Applied HEALTH PHYSICS, LLC**

## **CERTIFICATE OF RADIOLOGICAL TRAINING**

*This is to certify that*

**Todd Riggle**

*has successfully completed*

**24 HOUR RADIATION SAFETY OFFICER TRAINING COURSE  
AND INSTRUCTION AS REQUIRED BY NUREG-1556  
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, LLC  
May 13<sup>th</sup> through May 15<sup>th</sup>, 2014*

  
\_\_\_\_\_  
Todd Y. Mobley, Director, Technical Services

  
\_\_\_\_\_  
Management Review

\_\_\_\_\_  
Date

\_\_\_\_\_  
DOT Subpart H Expiration Date

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