

**TEAM**® Industrial Services, Inc.

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February 25, 2016

U.S. Nuclear Regulatory Commission  
Region IV  
1600 E, Lamar Blvd  
Arlington, Texas 76011-4511

Attention: Mark Shaffer, Director  
Division of Nuclear Materials Safety, Region IV

Subject: Response to an Apparent Violation  
NRC Inspection Report 030-35252/2015-001, EA-15-258  
NRC License No. 42-32219-01

Dear Mr. Shaffer:

In response to your letter dated January 13, 2016 describing the inspection performed at our Hammond, IN facility and the resulting alleged violation identified, TEAM Industrial Services provides the following written reply. The alleged violation is summarized below for reference followed by our response.

- 1) The apparent violation concerned the failure of two radiographers to wear alarming ratemeters while conducting radiographic operations. Specifically, the radiographers were wearing a device called a RadEye™ in order to fulfill the requirements in 10CFR Part 23 for a direct reading pocket dosimeter and the alarming ratemeter.*

As stated in our letter dated December 18, 2015, documenting the immediate corrective actions that were taken as a result of the violation, Team radiographic personnel will continue to wear 0-200 mrem direct reading pocket dosimeters and alarming ratemeters until such time that multi-modal devices such as the RadEye™ are approved for use under the 10CFR Part 34 regulation. The fact that the RadEye™ is not authorized for use in multiple modalities simultaneously will be reiterated to all Team locations.

We do however request that, if considering enforcement action, NRC assign a reduced severity level based on the performance of the technicians and the intent to comply with the regulation. Specifically, the technicians inspected at the temporary jobsite each wore a personal monitoring badge, carried and used a calibrated survey instrument, and each wore a calibrated operable RadEye™, which was intended to effectively replace the direct reading dosimeter and alarming ratemeter. Although the RadEye™ devices may not have been authorized for use in multiple modalities at the time of the inspection, the devices performed the individual characteristic required function of each required device. This viable effort to comply with the regulation should be recognized. Therefore we are

requesting that the severity for this violation be assigned a lower severity level than would typically be assigned for failure to wear required dosimetry.

Team Industrial Services still believes the new technology offered by these devices provides vast improvement in personal monitoring instrumentation and improves our capabilities to maintain exposures as low as reasonably achievable. It is our opinion that these devices, with the advancements in technology, also meet the requirements for personal monitoring as defined in the regulation. For these reasons we will continue to pursue authorization for use of these devices under 10 CFR Part 34.

If you should require any additional information or should you have any questions regarding this request, please contact me at 219/310-8560 or 219/229-2909.

Sincerely,



David P. Tebo  
Corporate Radiation Safety Officer  
TEAM Industrial Services

Cc: Deborah Piskura – USNRC Region III  
Jason VonEhr – USNRC Region IV  
Earl Banfield – Team Corporate RSM  
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DPT/: Team-NRC Response to Apparent Violation 022516