



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

January 31, 2017

Timothy McLaughlin
Radiation & Explosives Safety Officer
Schlumberger Technology Corporation
300 Schlumberger Dr. Mail Drop 121
Sugar Land, TX 77478

SUBJECT: NRC INSPECTION REPORT 030-06388/2016-001 and NOTICE OF VIOLATION

Dear Mr. McLaughlin:

This refers to the routine, unannounced, inspection conducted on November 28, 2016 at your facility in Sugar Land, Texas. The inspection determined that additional information was needed to determine the extent of the condition. You provided additional details regarding your audit and training records, with the final details being provided on January 18, 2017. This inspection was an examination of activities conducted under your license as they relate to radiation safety and compliance with the U.S. Nuclear Regulatory Commission's (NRC) rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures, representative records, and observation of activities. The preliminary inspection results were discussed with Mr. Charles Deible and Ms. Sandra Duffey of your staff at the conclusion of the onsite inspection. A final exit was conducted telephonically with you on January 23, 2017.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. This violation involved a failure to provide recurring hazardous material transportation training to employees as required by 10 CFR 71.5. This violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is available on the NRC's Web site at www.nrc.gov/document-collection/enforcement/enforce-pol.html. The violation is cited in the enclosed notice of violation and the circumstances surrounding them are discussed in detail. The violation is being cited in the notice because it was identified by the NRC during the inspection.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed on the docket in an email dated January 18, 2017 [ML17020A125]. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

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

Should you have any questions concerning this inspection or enclosed Notice of Violation, please contact Ms. Martha Poston-Brown at (817) 200-1181 or the undersigned at (817) 200-1191.

Sincerely,

/RA/

Ray L. Kellar, P.E., Chief
Nuclear Materials Safety Branch A
Division of Nuclear Materials Safety

Docket: 030-06388
License: 42-00090-03

Enclosure:
Notice of Violation

cc w/Enclosure:
Texas Radiation Control Program Director

NRC INSPECTION REPORT 030-06388/2016-001 and NOTICE OF VIOLATION DATED
 JANUARY 31, 2017

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NOTICE OF VIOLATION

Schlumberger Technology Corporation
Sugar Land, Texas

Docket No: 030-06388
License No: 42-00090-03

During an U.S. Nuclear Regulatory Commission (NRC) Inspection conducted on November 28, 2016, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

- A. 10 CFR 71.5 (a) requires, in part, that each licensee who transports licensed material outside the site of usage as specified in the NRC license or where transport is on public highways, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the Department of Transportation regulations in 49 CFR Parts 107, 171 through 180 and 390 through 397, appropriate for the mode of transport.

40 CFR 172.704 (a)(2) requires, in part, that each hazmat employee must be provided function specific training concerning the requirements of this subchapter or exemptions or special permits issued under Subchapter A of this chapter that are specifically applicable to the functions the employee performs.

49 CFR 172.704 (c)(2) requires, in part, that each hazmat employee must receive the training required by this subpart at least once every three years.

Contrary to the above, from January 9, 2015 to August 9, 2016 the licensee failed to provide function specific training concerning the requirements that each hazmat employee must receive the training at least once every three years. Specifically, audits performed by the Site RSO at the Prudhoe Bay Drilling and Measurement (D&M) field office for CY2015 and CY2016, identified individuals that were not current on their hazmat training. The CY2015 audit indicated that twelve employees were deficient, in that their employee profile indicated their job duties required hazmat training and they had either not completed training or had allowed their training to expire and the CY2016 audit indicated that four employees were also deficient for transportation training. Further investigation by the Corporate RSO, indicated that the issue was limited to the Prudhoe Bay D&M office and that between January 9, 2015, and August 9, 2016, thirty four (34) shipments of radioactive materials were made by individuals who were without current hazmat training (including those with expired training). The RSO indicated via email on January 18, 2017, that all individuals still in a job requiring hazmat training have completed the required training (training completion dates range between December 5th and December 24th of 2016). All other individuals identified are either no longer employed by the licensee, no longer involved in shipping or not currently assigned to the Prudhoe Bay D&M field office.

This is a Severity Level IV violation (Section 6.8.d.4)

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken to correct the violation and prevent recurrence, and the date when full compliance will be achieved is adequately addressed on the docket in email dated January 18, 2017 [ML17020A125]. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as "Reply to a Notice of Violation", and send it to the U.S. Nuclear Regulatory Commission, ATTN:

Enclosure

Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at www.nrc.gov/reading-rm/pdr.html or www.nrc.gov/reading-rm/adams.html. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction." In accordance with 10 CFR 19.11 you may be required to post this Notice within two working days.

Dated this 31st day of January 2017.