



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

July 5, 2018

EA-17-080

Mr. Chris Dixon
Radiation Safety Officer
Acuren USA
600 E. 57th Place, Suite B
Anchorage, AK 99518

SUBJECT: NRC INSPECTION 030-38596/2017-001 AND EXERCISE OF ENFORCEMENT DISCRETION

Dear Mr. Dixon:

On March 27, 2017, an unannounced routine inspection was conducted at your facility in Anchorage, Alaska. The U.S. Nuclear Regulatory Commission (NRC) documented the results of the inspection in Inspection Report 030-38596/2017-001 dated May 9, 2017, (NRC Agencywide Documents Access and Management System (ADAMS) Accession ML17128A127) and advised you of an unresolved item regarding the use of Direct Ion Storage (DIS) dosimeters (Mirion Instadose™) to satisfy the regulatory requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) 34.47 for personnel monitoring during radiographic operations.

Based on the results of the NRC review of this unresolved item, the NRC has determined that a violation of NRC requirements occurred involving the monitoring of personnel radiation dose by use of DIS dosimeters that are not physically processed by an accredited National Voluntary Laboratory Accreditation Program (NVLAP) processor, as required by 10 CFR 34.47(a). Specifically, DIS dosimetry does not require that the dosimeter be physically sent to a processor to extract the data. Rather, the raw data are extracted from the DIS dosimeters using an NVLAP-accredited processor's software and transmitted in electronic form from the DIS dosimeter to the processor for evaluation.

This violation would normally be categorized at Severity Level IV, in accordance with the NRC Enforcement Policy. However, Acuren USA has met the criteria listed in NRC Enforcement Guidance Memorandum (EGM) 18-001, "Interim Guidance for Dispositioning Apparent Violations of 10 CFR Parts 34, 36 and 39 Requirements Resulting from the use of Direct Ion Storage Dosimetry During Licensed Activities," dated May 11, 2018. Therefore, the NRC is exercising enforcement discretion and is not issuing an enforcement action for this violation. In addition, unresolved item 030-38596/2017-001-01 is closed.

The NRC's decision is based on the criteria listed in EGM 18-001 that: (1) the DIS dosimeters are being provided and dose data evaluated and reported for the dose of record by an NVLAP-accredited processor, (2) Acuren USA and the NVLAP processor have implemented specified quality controls to ensure that the DIS dosimeter is calibrated and/or replaced appropriately, and

(3) Acuren USA has maintained the necessary documentation and records to demonstrate that the criteria of EGM-18-001 are being implemented.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedures," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Should you have any questions regarding this letter, please contact Jason vonEhr at 817-200-1186, or the undersigned at 817-200-1455.

Sincerely,

/RA/

Michael C. Hay, Chief
Materials Licensing and Inspection Branch
Division of Nuclear Materials Safety

Docket: 030-38596
License: 50-32443-01

cc w/enclosure:
Dr. B. Jilly, State Lab Director
Alaska Radiation Control Program

NRC INSPECTION 030-38596/2017-001 AND NOTICE OF ENFORCEMENT DISCRETION,
DATED DATE XX 2018

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ADAMS ACCESSION NUMBER: **ML18187A331**

SUNSI Review: ADAMS: Non-Publicly Available Non-Sensitive Keyword:
By: JEV Yes No Publicly Available Sensitive

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