



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

July 23, 2018

EA-18-092

Mr. Matthias Kraneiss  
Corporate Radiation Safety Officer  
Petrochem Inspection Services, Inc.  
dba TÜV SÜD America,  
Chemical Oil & Gas  
1475 East Sam Houston Parkway South,  
Suite 100  
Pasadena, TX 77503

SUBJECT: NRC INSPECTION REPORT 030-36565/2018-002 AND CLOSURE OF  
UNRESOLVED ITEM FROM NRC INSPECTION 030-36565/2016-001

Dear Mr. Kraneiss:

This letter refers to the announced inspection conducted on June 14 and 26, 2018, at your facilities in Pasadena, Texas, and Billings, Montana. The inspection was an examination of activities conducted under your license as they relate to public health and safety, to confirm compliance with the U.S. Nuclear Regulatory Commission's (NRC's) rules, regulations, and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of licensed activities, and interviews with personnel. The inspection findings were discussed with you during an exit meeting on July 19, 2018. Based on the results of this inspection no violations were identified and the inspection report is included as an enclosure to this letter.

This letter also refers to the July 11, 2016, unannounced inspection that was conducted at your facility in Erie, Michigan. The NRC documented the results of the inspection in NRC Inspection Report 030-36565/2016-001 dated August 24, 2016, (NRC Agencywide Documents Access and Management System (ADAMS) Accession ML16238A282 and advised you of an unresolved item regarding the use of direct ion storage (DIS) dosimeters (Mirion Instadose™) for personnel monitoring during radiographic operations.

The NRC reviewed your compliance with personnel dosimetry requirements under Title 10 *Code of Federal Regulations* (CFR) 34.47 and determined that Petrochem Inspection Services, Inc., dba TÜV SÜD America, Chemical Oil & Gas is using DIS dosimetry designed for remote data evaluation to meet this requirement. The inspector reviewed the conditions described 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 (EA-18-092).

The inspector determined that: (1) the DIS dosimeters are being provided and dose data evaluated and reported for the dose of record by a National Voluntary Laboratory Accreditation

Program (NVLAP) accredited processor; (2) the licensee and NVLAP processor have implemented specified quality controls to ensure that the dosimeter is calibrated and/or replaced appropriately; and (3) the licensee has maintained the necessary documentation and records to demonstrate that the criteria of EGM-18-001 are being implemented. The unresolved item from NRC Inspection Report 030-36565/2016-001 is closed.

Future inspections will review and determine whether the criteria of EGM-18-001 continue to be met. If the NRC identifies that DIS dosimetry arrangements do not meet the criteria of EGM 18-001, a violation of 10 CFR 34.47(a) and (a)(3) will be considered. Such reviews will continue for as long as EGM-18-001 criteria remain in effect.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedures," a copy of this letter and its enclosure 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 C. Dykert at 817-200-1427, or the undersigned at 817-200-1455.

Sincerely,

/RA/

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

Docket: 030-36565  
License: 42-32507-01

Enclosure:  
NRC Inspection Report 030-36565/2018-002

cc w/enclosure:  
Brian Watson, Administrator  
Quality Assurance Division  
Department of Public  
Health & Human Services  
2401 Colonial Drive  
P.O. Box 202953  
Helena, MT 59620-2953

Eric Skotak, Manager  
Radioactive Materials  
Inspection Group  
Texas Department of  
State Health Services,  
Radiation Control Program  
P.O. Box 149347  
Austin, TX 78714-9347

NRC INSPECTION REPORT 030-36565/2018-002 AND CLOSURE OF UNRESOLVED ITEM  
FROM NRC INSPECTION 030-36565/2016-001 Dated July 23, 2018

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ADAMS ACCESSION NUMBER: **ML18205A321**

☒ SUNSI Review: ADAMS: ☐ Non-Publicly Available ☐ Non-Sensitive Keyword:  
By: JCD ☒ Yes ☐ No ☒ Publicly Available ☐ Sensitive EA-18-092

OFFICE	HP:MLIB	TL:ACES	C:MLIB			
NAME	JCDykert	GMVasquez	MCHay			
SIGNATURE	/RA/	/RA/ by JGK	/RA/			
DATE	7/16/18	7/19/18	7/23/18			

**OFFICAL RECORD COPY**

**SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION**

<b>1. LICENSEE/LOCATION INSPECTED:</b>  Petrochem Inspection Services, Inc. <i>dba</i> TÜV SÜD America, Chemical Oil & Gas 2637 Belknap Avenue Billings, Montana and 1475 East Sam Houston Parkway South Suite 100 Pasadena, Texas  REPORT NO.: 030-36565/2018-002		<b>2. NRC/REGIONAL OFFICE</b>  U.S. Nuclear Regulatory Commission Region IV, 1600 East Lamar Blvd Arlington, Texas 76011-4511	
<b>3. DOCKET NUMBER</b>  030-36565	<b>4. LICENSE NUMBER</b>  42-32507-01	<b>5. DATE OF INSPECTION</b>  June 14 and 26, 2018	

**LICENSEE:**

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

- ☒ 1. Based on the inspection findings, no violations were identified.
- ☒ 2. Previous violation closed.
- ☐ 3. The violations(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy to exercise discretion, were satisfied.
- ☐ Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):
- ☐ 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

**Licensee's Statement of Corrective Actions for Item 4, above.**

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Jason C. Dykert, Health Physicist	/RA/	7/19/18
BRANCH CHIEF	Michael C. Hay, Chief	/RA/	7/24/18