

OCT 13 1989

In Reply Refer To:  
License: 42-02964-01  
Docket: 30-06402/89-01

Western Atlas International  
ATTN: Bill Rose  
Radiation Safety Officer  
P.O. Box 1407  
Houston, Texas 77251

Gentlemen:

Thank you for your letter of September 18, 1989, in response to our letter and attached Notice of Violation both dated August 18, 1989. We have reviewed your reply and find it responsive to the concerns raised in our Notice of Violation. We will review the implementation of your corrective actions during a future inspection to determine whether full compliance has been achieved and will be maintained.

Sincerely,  
Original Signed By  
**LAWRENCE A. YANE**  
A. Bill Beach, Director  
Division of Radiation Safety  
and Safeguards

cc:  
Texas Radiation Control Program Director

bcc w/copy of licensee letter:  
DMB - Original (IE-07)  
RDMartin  
ABBeach  
LAYandell  
WLFisher  
LShea, RM/ALF (AR-2015)  
CLCain  
RJEverett  
WLHolley  
NMSB  
MIS System  
RIV Files (2)  
RSTS Operator

RIV:NMISOLD for  
WLHolley:ch  
10/10/89

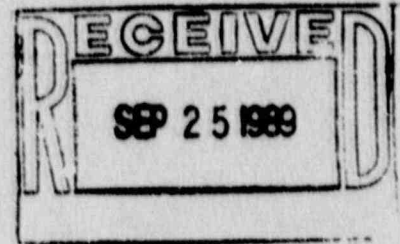
C:NMISOLD  
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10/10/89

D:DRSS  
ABBeach  
10/12/89

IE-07

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REG4 LIC30  
42-02964-01 PDC

September 18, 1989



Mr. William L. Fisher  
Nuclear Materials Branch  
Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 78011

RE: Docket #30-06402/89-10  
License #42-02964-01

Dear Mr. Fisher,

This letter is in response to your letter and Notice of Violation dated August 18, 1989 as a result of the radiological inspection conducted by Mr. Holly at the Western Atlas International, Inc., Atlas Wireline Services facility located at Mills, Wyoming and at Grace Drilling Rig 59, Van Ervin Tract Nos. 1-12, Austin Creek Field, Section 12 T 32 N-R 85 W, Latrona County, Wyoming.

1. 10 CFR 39.33(a)  
The Ludlum Model 2 Survey Meter Serial #5148 was recalibrated on July 20, 1989. All survey meters in Rock Springs and Mills, Wyoming are now current. An all company memo has been issued to remind every district to examine their survey meter calibration programs. Also districts have been notified to add survey meters to their monthly radioactive inventory. Additional information to be recorded is last date of calibration. Should the calibration date lapse or a meter become inoperable, the survey meter is to be tagged "Out of Service" and the batteries removed until recalibrated or repaired. Out of Service meters are to be noted on the inventory.

2. 10 CFR 39.43(b)  
A formal program for inspection and maintenance of tools, handling equipment, and radioactive shields/transport containers have been reviewed at the Mills facility. Bob Bangerter is now acting as Radiation Safety Officer at this facility. He has been furnished with a form "Inspection and Maintenance Report on Radioactive Sources and Equipment". This form will be issued to Atlas Wireline Services locations semi-annually in conjunction with leak test kits from this office to insure each location is reminded to perform this inspection. Since past records cannot be located, a copy of this letter will be placed in the Inspection File to mark the beginning of the maintenance inspection file for a period of two years. Compliance achieved September 15, 1989.

*89 100 30100 ZPP*

3. CFR 39.61(c)

The Radiation Safety Training and Review Program has been re-established. All employees are presently current. Compliance achieved September 15, 1989.

4. CFR 39.75(a)

Western Atlas International, Inc., Atlas Wireline Services Radioactive Policy and Procedures Manual is now carried on each logging unit stationed in Rock Springs and Mills, Wyoming. Compliance achieved September 15, 1989.

5. 10 CFR 39.73

The Mills, Wyoming office has been furnished with current copies of CFR Parts 19, 20 and 39. Copies of leak test certificates for 1988 have also been furnished to complete the radiation file. Compliance achieved September 15, 1989.

In the past three years, Mills, Wyoming has had 100% personnel turnover and the Rock Springs district has had about 95% personnel turnover. The Radiation Safety Program has suffered due to the lack of continuity of Radiation Safety Officers at these facilities over this period of time. Now that some normalcy has returned to these districts, it is expected that these districts will maintain a radiation program superior to the past three years.

Should additional information be required, please advise.

Sincerely,

*Bill Rose*

Bill Rose  
Radiation Safety Officer

BR:mm

cc: Jack Wasson  
Mills, Wyoming RA File  
Rock Springs, Wyoming RA File  
NRC File



AUG 18 1989

In Reply Refer To:  
Docket: 30-06402/89-01  
License: 42-02964-01

Western Atlas International  
ATTN: Bill Rose  
Radiation Safety Officer  
P.O. Box 1407  
Houston, Texas 77251

Gentlemen:

This refers to the special, unannounced radiation safety inspection conducted by Mr. Wesley Holley of this office on July 10 and 13, 1989, at the Mills, Wyoming, district office and at Grace Drilling Rig 59, Van Ervin Tract Nos.1-12, Austin Field Creek field, Section 12, T32N/R85W, Latrona County, Wyoming. The inspector reviewed activities authorized by NRC Byproduct Material License 42-02964-01 and discussed findings with members of your staff at the conclusion of the inspection. The logging crew at Grace Drilling Rig 59 was from your Rock Springs office.

The inspection was an examination of the activities conducted under the license as they relate to radiation safety and to compliance with the Commission's rules and regulations, and the conditions of the license. The inspection consisted of selective examinations of procedures and representative records, interviews of personnel, independent measurements, and observations by the NRC inspector.

During this inspection, it was found that certain of your activities were in violation of NRC requirements. Consequently, you are required to respond to these violations, in writing, in accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Your response should be based on the specifics contained in the Notice of Violation enclosed with this letter.

The response directed by this letter and the accompanying Notice is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,  
**Original Signed By:**  
**William L. Fisher**

William L. Fisher, Chief  
Nuclear Materials Safety Branch

Enclosure: (see next page)

\*RIV:NMIS C:NMIS  
WLHolley:gb CLCain  
/ /89 8/17/89  
\* Previously Concurred

C:NMSB  
WLFisher  
8/17/89

908290044 2PP

IE-07

Enclosure:  
Appendix - Notice of Violation

cc w/enclosure:  
Wyoming Radiation Control Program Director

bcc:

DMB - Original (IE-07)

RD Martin

AB Beach

WLFisher

LShea, RM/ALF (AR-2015)

\*MIS System

\*RSTS Operator

\*CLCain

\*RJEverett

\*Inspector

✓ \*NMSE

\*RIV Files (2)

\*w/766

APPENDIX

NOTICE OF VIOLATION

Western Atlas International  
Houston, Texas

Docket: 30-06402/89-01  
License: 42-02964-01

During an NRC inspection conducted on July 10 and 13, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

1. 10 CFR 39.33(a) requires, in part, that the licensee shall keep a calibrated and operable radiation survey instrument at each field station and temporary jobsite to make the radiation surveys required by Parts 20 and 39 of Title 10. 10 CFR 39.33(c)(1) requires calibrations to be conducted at intervals not to exceed 6 months.

Contrary to the above, the inspector determined that the survey meter (Ludlum Model 2, Serial Number 5148) in use at the Grace Drilling Rig 59 was out of calibration at the time of the inspection, July 13, 1989. The meter had been calibrated last on December 15, 1988, and thus was due for calibration on June 15, 1989.

Also, two instruments which had been used at other job sites were found not to have been calibrated at 6-month intervals. A Ludlum Model 2, Serial Number 17697, had not been calibrated between August 24, 1988, and April 11, 1989. A Victoreen Model 493, Serial Number 2321, had not been calibrated between July 17, 1987, and March 2, 1988. These instruments had been used after the calibration expiration date.

This is a Severity Level IV violation. (Supplement VI)

2. 10 CFR 39.43(b) requires, in part, that each licensee shall have a program for semiannual visual inspection and routine maintenance of source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars to ensure that the required labeling is legible and that no physical damage is visible.

Contrary to the above, the inspector determined that the licensee did not have a formal program for semiannual visual inspections and such inspections had not been performed at the Mills, Wyoming, office during 1987, 1988, and 1989.

This is a Severity Level IV violation. (Supplement VI)

3. 10 CFR 39.61(c) requires that the licensee provide safety reviews for logging supervisors and logging assistants at least once during each calendar year.

890829 0048 200



Contrary to the above, the inspector determined that a Mills, Wyoming, service engineer had not had a safety review during 1988.

This is a Severity Level IV violation. (Supplement VI)

4. 10 CFR 39.75(a) requires, in part, that each licensee conducting operations at a temporary jobsite shall maintain operating and emergency procedures at the temporary jobsite until the well logging operation is completed.

Contrary to the above, the inspector determined that the Rock Springs, Wyoming, logging crew at the Grace Drilling Rig 59 did not possess the licensee's operating and emergency procedures.

This is a Severity Level V violation. (Supplement VI)

5. 10 CFR 39.73 requires, in part, that each licensee shall maintain a copy of Part 39 of NRC regulations and leak test results at each field station.

Contrary to the above, the inspector determined that the licensee did not possess a copy of Part 39 nor records of leak test results for the last half of 1986 at the Mills, Wyoming, office at the time of the inspection.

This is a Severity Level V violation. (Supplement VI)

Pursuant to the provisions of 10 CFR 2.201, Western Atlas International is hereby required to submit to this office, within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas,  
this 18th day of August 1989





BUCKET NO. (8 64116) OR LICENSE  
 NO. (BY PRODUCT) (13 64116)

REPORT

MODULE NUMBER

**INSPECTOR'S REPORT**  
 (Continuation)

Office of Inspection and Enforcement

03006402

NO

SEC

STH 7/10/01

VIOLATION SEVERITY  
 OR DEVIATION

TYPE  
 RELATED SUP.

A

1 2 3 4 5 6 7 8 9 10

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A C  
 B D

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VIOLATION OR DEVIATION IS ENTERED IN 2400 CHARACTERS FOR EACH ROW. IF THE ROW EXCEEDS THIS NUMBER, IT WILL BE NECESSARY TO PARAPHRASE. LIMIT WORDS TO 20 CHARACTERS EACH.

1 Contrary to 10CFR 39.23 (c)(1), the  
 2 license holder allowed survey meter  
 3 calibration to exceed 6 mrad for  
 4 2 meters

**INSPECTOR'S REPORT**  
 (Continuation)  
 Office of Inspection and Enforcement

DOCKET NO. (8 DIGIT) OR LICENSE NO. (8 BY PRODUCT) (18 DIGIT)		REPORT		MODULE NUMBER		DATE RELATED		SPL.	
03006402		NO	SEC	5731711010		A C		6	
				VIOLATION SEVERITY OR DEVIATION		B D			
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				X		B D			
						A C			
						B D			

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 60 characters each.)

- 1 Contrary to 39.61(c), the licensee
- 2 did not perform an annual review
- 3 of a logging service engineer.
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**INSPECTOR'S REPORT**  
 (Continuation)  
 Office of Inspection and Enforcement

BUCKET NO. (IF SHIP) OR LICENSE  
 NO. (BY PRODUCT) (13 DIGIT)

03006402

REPORT

NO

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MODULE NUMBER

58771/1019

VIOLATION SEVERITY  
 OR DEVIATION

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VIOLATION OR DEVIATION (Enter up to 2400 characters for each row. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

1 Contrary to 10CFR 39.73(a), the licensee

2 did not possess a copy of

3 10CFR 39.

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**INSPECTOR'S REPORT**  
 (Continuation)

Office of Inspection and Enforcement

SOCKET NO. (8 DIGITS) OR LICENSE NO. (BY PRODUCT) (13 DIGITS) 03006402		REPORT NO. 8901		MODULE NUMBER 5F71001		DATE RELATED A C B D	
				VIOLATION SEVERITY OR DEVIATION 1 2 3 4 5 6 D X		SUP. 6	

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

1 Contrary to 10 CFR 29.43 (b), the  
 2 licensee did not have a program for  
 3 semiannual equipment inspection  
 4 and routine maintenance of equipment.

**INSPECTOR'S REPORT**  
 (Continuation)  
 Office of Inspection and Enforcement

SOCKET NO. (8 DIGITS) OR LICENSE NO. (BY PRODUCT) (13 DIGITS) 03000402		REPORT NO. 89-01		MODULE NUMBER 578171/1010		DATE	
		A		VIOLATION SEVERITY OR DEVIATION		BYE RELATED	SUPPL.
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		C					
		D			X		
						A	C
						B	D
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VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

- 1 Contrary to 10 CFR 39.55(b) the
- 2 licensee did not maintain leak test
- 3 records of sealed sources for
- 4 1986 at the Mills field office.

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BUCKET NO. (E SHIP) OR LICENSE NO. (BY PRODUCT) (13 0010)

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578711010

**INSPECTOR'S REPORT**  
 (Continuation)

Office of Inspection and Enforcement

030016402

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VIOLATION SEVERITY OR DEVIATION

SIZE RELATED

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A C B D

X

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VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

1 Contrary to 10 CFR 29.23(b), the licensee  
 2 did not possess a current calibrated survey  
 3 instrument at a temporary jobsite.



**INSPECTOR'S REPORT**  
**(Continuation)**  
**Office of Inspection and Enforcement**

BUCKET NO. (8 DIGITS) OR LICENSE NO. (BY PRODUCT) (13 DIGITS)		REPORT		MODULE NUMBER		DATE	
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VIOLATION SEVERITY OR DEVIATION								TYPE RELATED		EMPL.
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										6

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 60 characters each.)

1 Contrary to 10 CFR 39.75 (a), the licensee  
 2 did not have a copy of his operating and emergency  
 3 procedures at the logging jobsite.

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