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, Division of Rad and Safeguards

Safety

cc: Texas Radiation Control Program Director

bcc w/copy of licensee letter:

DMB - Original (IE-07)

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### ATLAS WIRELINE SERVICES

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SEP 25 1989

September 18, 1989

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

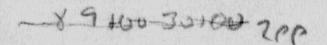
RE: Docket #30-06402/89-10 License #42-02964-01

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 Courty, 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 Radioacitve 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.



P. O. Box 1407, Houston, Texas 77251 (713) 972-5681

- 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 Radiation Safety Officer

BR:mm

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

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 1C, 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.

Original Signed By: William L. Fisher

William L. Fisher, Chief Nuclear Materials Safety Branch

Enclosure: (see next page)

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4908790094 JPP

IE-07

Enclosure:

Appendix - Notice of Violation

cc w/enclosure:

Wyoming Radiation Control Program Director

bcc:

DMB - Original (IE-07)

RDMartin ABBeach WLFisher

LShea, RM/ALF (AR-2015)
\*MIS System
\*RSTS Operator

\*CLCain

\*RJEverett \*Inspector

MMSB

\*RIV Files (2)

<sup>\*</sup>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:

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)

 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. 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)

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

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