

BUCKEYE WELL SURVEYS, INC.

Buckeye Well Surveys, Inc.
P.O. Box 208
Louisville, Ohio 44641

October 13, 1989

U.S. Nuclear Reg. Comm.
Materials Licensing Sec.
799 Roosevelt Road
Glen Ellyn, IL 60137

Attn: Mr. Mallett

Dear Mr. Mallett:

I would like to thank you for taking the time to review our violations with us and offering advice to help strengthen our radiation program here at Buckeye Well Surveys. We would hope that in the future, should any questions arise, your office would be open for suggestions and answers and our office likewise to you.

In response to our meeting on October 3, 1989, Buckeye Well Surveys would like to submit the following solutions, changes, and guidelines to our inspection violations of May 1-2, 1989.

VIOLATION #1

Regarding the use of a 25 microcurie cesium-137 sealed source, which was not authorized on the license.

- A. That particular source was somehow acquired during a time of expansion and growth at Buckeye Well Surveys. It was brought along by an individual who was hired to build our logging tools and was used solely for the calibration of those tools. In recent years, however, there has been a considerable decline in the oil and gas industry. Because of the industry decline, we have been forced to decline our output as well. Due to this, we can see no growth in the future for Buckeye Well Surveys. Without growth there is no need to acquire more sealed sources of any kind from any individual or company to be used by us.

8911300027 891117
REG3 LIC30
34-18050-01 PDC

OCT 16 1989

P.O. BOX 208 Louisville, Ohio 44641 (216) 455-6860

• LOGGING • PERFORATING

BUCKEYE WELL SURVEYS, INC.

To prevent the acquisition of sealed sources or any radioactive material from entering our premises we have developed the following guidelines:

1. Sole authority to purchase or acquire any type of Radioactive Material rests in the hands of the President of Buckeye Well Surveys. Currently that authority is Charles Withey.
2. The proper authorities will be notified on the local, state, and federal levels, if a source were to arrive on our premises without the proper authority and documentation. Attempts will be made to find the owner or manufacturer of the source and return it to them. If these attempts prove futile, then the NRC will be notified for removal and disposal of that particular item.
3. If the authority has been given by the President of Buckeye Well Surveys to acquire a sealed source, then the NRC will be notified in writing that we are in the process of acquiring a sealed source, the type of source to be acquired, and the manufacturer of that item, followed by a letter of receipt of the sealed source and changes made to place the source on our license.

*The source in question for Violation number one had been sent for amendment on our license and hopefully will be in processing as soon as possible.

VIOLATION #2 and #3

Buckeye Well Surveys permitted an individual, not specifically named on the license, to use licensed material since September 1988. That individual was not under the supervision and presence of an individual named on the license and did not have the proper training to handle licensed material.

- A. The individual in question for this violation is Charlie McKinney. We were under the impression, due to Charlie's prior work experience at Perfection Well Surveys where he was employed for several years, that he was well qualified to handle licensed material. While at Perfection he attended monthly safety and handling seminars for hazardous materials but it never crossed our mind that he did not have any formal education to become a logging supervisor.

P.O. BOX 208 Louisville, Ohio 44641 (216) 455-6860

• LOGGING • PERFORATING

BUCKEYE WELL SURVEYS, INC.

To prevent untrained personnel from becoming logging supervisors or handling hazardous materials, we have developed the following guidelines:

1. Any individual to be hired as a logging supervisor will be required to show proof of schooling to handle hazardous materials.
2. All individuals hired by Buckeye Well Surveys will attend seminars for safety and handling of hazardous materials on a regular basis. These seminars will be given by Buckeye Well Surveys in accordance to the guidelines established on our license.
3. All logging supervisors will be placed on our license and copies of their credentials and qualifications shall be attached. If any individual does not meet the qualifications to become a logging supervisor, he/she will remain a logging assistant until those qualifications are met.

We are currently in the process of developing our own training for employees, who wish to become a qualified logging supervisor. The guidelines for that training have been established on our license according to NRC rules and regulations. We will submit a copy of our training program to the NRC when we have everything finalized. We feel by developing our own training program we can emphasize to our employees the importance of safety and knowledge of hazardous materials. By emphasizing these two main points, our employees will be more aware of what they are doing for their sake and for those around them. Secondly, by developing our own training there is more stability and uniformity as to record keeping, inventory, handling of sources and the like. By having a more uniform system, each individual would be able to assume the responsibilities for someone who might leave our employ, especially in the case of a R.S.O.

VIOLATION #4

The licensee has used licensed material since July 1987 and failed to have a Radiation Safety Officer as approved on the license.

- A. The duties of the R.S.O. were being handled by Chuck Withey until our license renewal was approved. Our original R.S.O. listed on the license at the time of inspection had left our employ, due to lack of work. At that time we submitted our license for renewal and named a new R.S.O. for Buckeye Well Surveys. This can be checked by referring to License Number 34-18050-01, Control Number 385484. Since that time, an amendment has been sent to list Roger Butler as the R.S.O.

P.O. BOX 208 Louisville, Ohio 44611 (216) 455-6860

• LOGGING • PERFORATING

BUCKEYE WELL SURVEYS, INC.

Due to the number of violations at the time of inspection, Chuck Withey is now going to become our new R.S.O. We feel that the duties of the R.S.O. were being neglected and by making Chuck the R.S.O. we can build a stronger program and manage our hazardous materials better.

VIOLATION #5

The licensee failed to list all of the licensed material on an inventory performed November 24, 1988 and failed to include the name of the individual who conducted the inventories from 1987-1988.

- A. The materials for the inventory being questioned are located in Bradford, PA. On this violation I feel that there was some misunderstanding between the NRC inspector and the R.S.O. at Buckeye Well Surveys in Louisville, Ohio. The question presented by the inspector was "Did you inventory these sources." The reply was "No I did not." Meaning the R.S.O. personally did not inventory those sources, but not meaning they had not been inventoried at all.

Mr. Richard Hitchcock runs our Bradford station and maintains records and inventories at his site. The inventory in question for November 24, 1988 will be submitted to the NRC to show that it has been completed.

Previously, our inventory forms did not have a specific place for a signature of the individual performing the duties. The new form submitted with our new license does have a place at the bottom for a signature to alleviate this problem.

In the future, all inventories and other pertinent forms will be sent from Bradford, PA to Louisville, OH and kept at his office until such time when the Bradford station is issued its own Nuclear license. That process is currently on the table and will hopefully be taken care of shortly. In the meantime, quarterly visits to the Bradford station will be made by management to assure proper care is being taken and all procedures are being followed.

VIOLATION #6

The licensee failed to leak test each sealed source at six month intervals. Specifically those sources used in Pennsylvania.

BUCKEYE WELL SURVEYS, INC.

- A. According to the individuals at our Bradford station, the leak tests were done. I contacted Mr. Stokely at Gulf Nuclear, Inc. to get copies of those leak tests or information to find out if they had been done. Mr. Stokely was not available and will not be available to me until either Friday October, 13 or Monday October, 15. He is currently offshore and as soon as I receive this information I will forward it on to you.

Quarterly visits by management will hopefully keep this problem from happening again. All leak tests will be performed by this office and records will be kept at Louisville, OH. This violation is an oversight on our part and a result of poor record keeping. An individual will be assigned to watch over the record keeping as a system of checks and balances.

VIOLATION #7

The licensee transported sealed sources with shipping papers that did not include the prescribed shipping name, Radioactive Material Special Form, NOS. Also, four containers failed to have the required yellow II or yellow III labels attached.

- A. The shipping papers were changed to meet Ohio DOT specifications before our inspection. At the time of the inspection, Mr. Gibbons showed us where the prescribed name had to be on the form and changes were made the following day. All of our shipping papers now contain the name Radioactive Material Special Form NOS and meet both federal and state requirements.

The source containers lost their labels during normal use and washing. Over a period of time, these labels were either unreadable or completely gone. Since the time of the inspection, new stickers have been placed on all source containers. We called around the country to find metal tags to place on our containers, but we were unable to find a company who makes them. A roll of yellow 2 and yellow 3 stickers was purchased to bring our containers up to standard. Each truck carries a spare set of stickers in case one should happen to get lost on the road or on location.

In the future, tighter control will be placed upon our men and their equipment. Management will make sure that the proper forms are filled out and

P.O. BOX 208 Louisville, Ohio 44641 (216) 455-6860

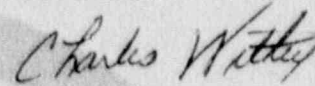
• LOGGING • PERFORATING

BUCKEYE WELL SURVEYS, INC.

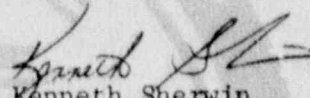
filed with the R.S.O. without delay. Spot checks will be made on equipment to keep everything up to standard to assure the safety and well being of each employee. All activities will be regularly audited and inspected to assure that the proper functions are correctly performed.

We hope these responses are suitable to you. If you have any questions, please feel free to contact us at (216)455-6860 or write us at Buckeye Well Surveys, Inc. P.O. Box 208, Louisville, OH 44641.

Sincerely,



Charles Withey
President
Buckeye Well Surveys, Inc.



Kenneth Sherwin
Vice President
Buckeye Well Surveys, Inc.

CW,KS/cs

P.O. BOX 208 Louisville, Ohio 44641 (216) 455-6860

• LOGGING • PERFORATING