

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

Report: 82-02

License: 35-19797-01

Docket: 30-19244

Priority: II Category: E

Licensee: Saturn Wireline Services, Inc.
P. O. Box 650
Hominy, Oklahoma 74035

Meeting Conducted: September 15, 1982

Report Prepared by:

D. Blair Spitzberg
D. Blair Spitzberg, Radiation Specialist

9/17/82
Date

Approved by:

R. J. Everett
R. J. Everett, Chief, Materials Radiation
Protection Section

9/20/82
Date

Meeting Summary

Meeting held September 15, 1982 (Report 30-19244/82-02)

An Enforcement Conference was held by telephone to discuss the findings of the NRC inspection conducted on September 2-3, 1982. The purpose of the meeting was to discuss the safety violations identified during the inspection, licensee response to the violations, and enforcement options available to the NRC.

Results: The NRC staff presented six violations of NRC requirements. The Licensee's representative conveyed his understanding of the violations, and offered corrective actions, additional information, or explanations in response to each item. The NRC staff expressed concern as to the nature and number of violations and summarized the enforcement options available. The NRC staff stated that a letter with the Notice of Violation would be sent to the licensee and the licensee's written response would be carefully reviewed to determine the need for additional enforcement action.

DETAILS

Persons Participating in the Meeting

a. Saturn Wireline Services, Inc.

O. C. LaMascus, President, RSO

b. NRC-RIV

R. J. Everett, Chief, Materials Radiation Protection Section

D. B. Spitzberg, Radiation Specialist

INSPECTOR'S REPORT
Office of Inspection and Enforcement

SPITZBERG, D.F.
REVIEWER

INSPECTORS
SPITZBERG

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO	SEQ	MO	YR
Saturn Wireline	<input checked="" type="checkbox"/> - INSERT <input type="checkbox"/> - MODIFY <input type="checkbox"/> - DELETE <input type="checkbox"/> - REPLACE	03019244	8201	A		
				B		
				C		
				D		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY		ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting - Weekly Manpower Reporting" for code)		
FROM		TO				1 - REGIONAL OFFICE STAFF 2 - RESIDENT INSPECTOR 3 - PERFORMANCE APPRAISAL TEAM	OTHER	REGION	DIVISION	BRANCH
MO	DAY	YR	MO	DAY	YR					
09	02	82	09	05	82			4	B	A

REGIONAL ACTION (Check one box only)		TYPE OF ACTIVITY CONDUCTED (Check one box only)			14 - INQUIRY 15 - INVESTIGATION	
<input checked="" type="checkbox"/> 1 - NRC FORM 581	<input type="checkbox"/> 2 - REGIONAL OFFICE LETTER	<input checked="" type="checkbox"/> 02 - SAFETY <input type="checkbox"/> 03 - INCIDENT <input type="checkbox"/> 04 - ENFORCEMENT <input type="checkbox"/> 05 - MGMT. AUDIT	<input type="checkbox"/> 06 - MGMT. VISIT <input type="checkbox"/> 07 - SPECIAL <input type="checkbox"/> 08 - VENDOR <input type="checkbox"/> 09 - MAT. ACCT.	<input type="checkbox"/> 10 - PLANT SEC. <input type="checkbox"/> 11 - INVENT. VER. <input type="checkbox"/> 12 - SHIPMENT/EXPORT <input type="checkbox"/> 13 - IMPORT		

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS	ENFORCEMENT CONFERENCE HELD	REPORT CONTAIN 2,790 INFORMATION	LETTER OR REPORT TRANSMITTAL DATE					
A	B	C	D				MO	DAY	YR	MO	DAY	YR
<input checked="" type="checkbox"/> 1 - CLEAR	<input type="checkbox"/> 2 - VIOLATION	<input type="checkbox"/> 3 - DEVIATION	<input type="checkbox"/> 4 - VIOLATION & DEVIATION	06	<input checked="" type="checkbox"/> 1 - YES	<input type="checkbox"/> 1 - YES	10	25	82			

MODULE INFORMATION														MODULE INFORMATION																			
MODULE NUMBER INSP										MODULE REQ. FOLLOWUP				MODULE NUMBER INSP										MODULE REQ. FOLLOWUP									
REC. ORD.	TYPE	NUMBER	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	STATUS	REC. ORD.	TYPE	NUMBER	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	STATUS
B		530703	B														B		592706	B													
B		530800	B														B																
B		577710	B														B																
B		586740	B														B																

INSPECTOR'S REPORT
Office of Inspection and EnforcementSPITZBERG, D.B.
REVIEWER

INSPECTORS

SPITZBERG

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO	SEQ	MO	YR
Sexton Wireline	<input checked="" type="checkbox"/> - INSERT	03019244	8202	A		
	<input type="checkbox"/> M - MODIFY			B		
	<input type="checkbox"/> D - DELETE			C		
	<input type="checkbox"/> R - REPLACE			D		

PERIOD OF INVESTIGATION/INSPECTION						INSPECTION PERFORMED BY		ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See IEMC 0530 "Manpower Reporting—Weekly Manpower Reporting" for code)		
FROM			TO			1 - REGIONAL OFFICE STAFF	OTHER	REGION	DIVISION	BRANCH
MO	DAY	YR	MO	DAY	YR	2 - RESIDENT INSPECTOR				
09	15	82	09	15	82	3 - PERFORMANCE APPRAISAL TEAM		4	B	A

REGIONAL ACTION (Check one box only)	TYPE OF ACTIVITY CONDUCTED (Check one box only)			
	02 - SAFETY	06 - MGMT. VISIT	10 - PLANT SEC.	14 - INQUIRY
<input type="checkbox"/> 1 - NRC FORM 581	03 - INCIDENT	07 - SPECIAL	11 - INVENT. VER.	15 - INVESTIGATION
<input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER	04 - ENFORCEMENT	08 - VENDOR	12 - SHIPMENT/EXPORT	
	05 - MGMT. AUDIT	09 - MAT. ACCT.	13 - IMPORT	

INSPECTION/INVESTIGATION FINDINGS (Check one box only)				TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS	ENFORCEMENT CONFERENCE HELD	REPORT CONTAIN 2790 INFORMATION	LETTER OR REPORT TRANSMITTAL DATE							
A	B	C	D				NRC FORM 581 OR REG. LETTER ISSUED			REPORT SENT TO HQ FOR ACTION				
<input checked="" type="checkbox"/>				0.6	<input checked="" type="checkbox"/>	1 - YES	1 - YES	MO	DAY	YR	MO	DAY	YR	

MODULE INFORMATION														MODULE INFORMATION																										
MODULE NUMBER INSP										MODULE REQ. FOLLOWUP				MODULE NUMBER INSP										MODULE REQ. FOLLOWUP																
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B	153070218								A	001											B									A										
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* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

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

DOCKET NO. (8 digits) OR LICENSE
NO. (BY PRODUCT) (13 digits)

03019244

REPORT

NO.

SEQ

8201

MODULE NUMBER

577710B

VI

VIOLATION SEVERITY OR DEVIATION

1	2	3	4	5	6

SITE
RELATED

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 50 characters each.)

10 CFR 20.207(a) requires that licensed materials stored in an unrestricted area shall be secured from unauthorized removal from the place of storage.

Contrary to this requirement, on September 2, 1982, ^athe 3 ^{curie} Am:Be neutron source in storage at the licensee's facility was not secured from unauthorized removal. ^{in an unrestricted area}

INSPECTOR'S REPORT
(Continuation)

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE
NO. (BY PRODUCT) (13 digits)

03019244

REPORT

NO.

SEQ.

8201

MODULE NUMBER

57771018

VIOLATION SEVERITY OR DEVIATION

1 2 3 4 5 6

SITE
RELATED

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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.)

10 CFR 20.201(b) requires, in part, that each licensee shall make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in this part.

Contrary to this requirement, as of September 2, 1982, the licensee had not made surveys necessary to comply with 10 CFR 20.105 "Permissible levels of radiation in unrestricted areas." Specifically, no surveys or evaluation had been made incident to the transfer of 2 Ci Cs-137 sources by means of a remote handling tool from unrestricted areas outside the licensee's facility to the storage area.

two

NRC FORM 750-A (11-81) (E MC 0535)	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT		MODULE NUMBER		VIOLATION SEVERITY OR DEVIATION 1 2 3 4 5 6 A C B D
	03019244		NO	SEQ	57771018		
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INSPECTOR'S REPORT (Continuation) Office of Inspection and Enforcement				C			
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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.)

License Condition 18 requires, in part, that the licensee possess and use licensed material in accordance with statements, representations, and procedures contained in application dated June 4, 1981, and letters dated June 16, 1981 and April 5, 1982.

a. The procedures contained in application dated June 4, 1981, and letters dated April 5, 1982, describe the instrumentation to be available and the routine surveys to be performed.

(i) Contrary to these requirements on the date of the inspection only 2 of the required 3 survey instruments had been purchased by the licensee and neither were available to perform surveys. ~~on April 23, 1982, when compensated density logs were made (Records showed both instruments were undergoing calibration).~~

(ii) Contrary to these requirements, on the date of the inspection no routine well head surveys had been performed or documented.

(iii) Contrary to these requirements, on the date of the inspection, no monthly vehicle surveys had been performed or documented.

b. Item 12 of the license application contains information relating to the dosimetry to be provided to the personnel.

Contrary to this requirement, film badges were not available for personnel from August 26, 1981, when logging activities began until November 1, 1981, when film dosimetry service was initiated.

c. Section 3 of the procedures contained in application states that all Cs-137 sources will be kept locked in the storage facility unless actually in use.

Contrary to this requirement, from the time the license ^{was issued, the} sources had frequently been stored in the transportation vehicles when not in use.

d. Attached to the letter dated April 5, 1982, is a diagram of the licensee's facility at 220 East Main Street, Homing, Oklahoma.

Contrary to this representation, on September 2, 1982, an unlocked door was noted in the back of the work shop area which did not appear on the diagram. This door would have given free access to the licensee's neutron source from the adjoining facility which was not under licensee's control.

INSPECTOR'S REPORT
(Continuation)

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE
NO. (BY PRODUCT) (13 digits)

03019244

REPORT

NO

SEC

MODULE NUMBER

5777106

VI

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VIOLATION SEVERITY OR DEVIATION

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1 2 3 4 5 6

SITE
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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 50 characters each.)

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3. License Condition 14 requires, in part, that each sealed source be tested for leakage at intervals not to exceed 6 months and each source received without a certificate of leak test not be put into service until tested.
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6. Contrary to this requirement, on September 2, 1982, sealed source with serial No. CSV 933 (2 Ci Cs-137) had not been leak tested since it was received in July 1981. Sealed sources NA 9182 (2 Ci Cs-137) and T718 (3 Ci Am:Be) were not leak tested before entering service when they were received without a certificate of leak test during June 1982 and July 1982, respectively.
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INSPECTOR'S REPORT
(Continuation)

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE
NO. (BY PRODUCT) (13 digits)

03019244

REPORT

NO

SEQ

8201

MODULE NUMBER

5181074015

VI

VIOLATION SEVERITY OR DEVIATION

1	2	3	4	5	6

SITE

RELATED

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 50 characters each.)

10 CFR 71.5 require that shipments of licensed radioactive materials be made in compliance with applicable regulations of the Department of Transportation.

- a. 49 CFR 173.394(a) requires, in part, that Type A quantities of special form radioactive material be packaged and transported in DOT specification 7A containers.

Contrary to this requirement, since the license was issued in June 1981, Type A quantities of special form radioactive material had been transported to field sites in transport containers which had not been certified DOT 7A. did not have documentation which certified them DOT 7A. certifying them as DOT 7A containers.

- b. 49 CFR 173.398(a) requires, in part, that each shipper of special form radioactive material shall maintain on file for at least one year after the last shipment a complete certification and supporting analysis of special form material shipped by the licensee.

Contrary to this requirement, sealed source performance test records as required by 49 CFR 173.398(a) were not available for sources shipped during the period June 1981 to September 1982.

INSPECTOR'S REPORT
(Continuation)

Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE
NO. (BY PRODUCT) (13 digits)

03019244

REPORT

NO.

SEQ.

8201

MODULE NUMBER

57771108

VI

VIOLATION SEVERITY OR DEVIATION

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				✓	

SITE
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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.)

License Condition 16 requires, in part, that the licensee conduct a physical inventory every 6 months to account for all sealed sources possessed under the license.

Contrary to this requirement, on the date of the inspection, no physical inventories of sealed sources possessed under the license had been performed by the licensee since the license was issued on June 30, 1981.

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