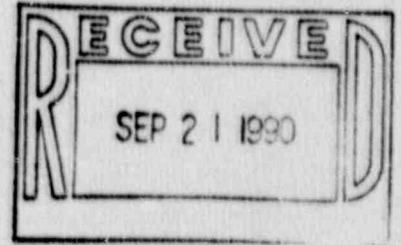




FILE



June 20, 1990

Mr. Bill Beach
U.S. Nuclear Regulatory Commission
Region IV
Nuclear Materials Safety Section
611 Ryan Plaza Drive. Suite 1000
Arlington, TX 76011

Re: License : 42-26928-01
Docket : 30-30429/90-01

The violation of 10 CFR 20.401(b) has been corrected as of June 20, 1990. The forms for documentation of monitoring for removable contaminants have been changed to report the correct units of measure ie: $\mu\text{Ci}/100 \text{ cm}^2$.

Regards,



Doug Elliott
Manager

DE/bmw

[f:de/nrc3]

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REG4 LIC30
42-26928-01 FDC

IC-90-277

JUN 7 1990

In Reply Refer To:
License: 42-26928-01
Docket: 30-30429/90-01

Pro-Technics International, Inc.
ATTN: John W. Chisholm, President
14760 Memorial Drive
Suite 206
Houston, Texas 77079

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Ms. L. L. Kasner of this office and Mr. R. A. Brown of the NRC Region II office, Atlanta, Georgia, of the activities authorized by NRC Byproduct Material License 42-26928-01. This inspection included program reviews conducted at your offices in Houston, Texas, on January 31 through February 2, 1990; Casper, Wyoming, on February 16, 1990; Parkersburg, West Virginia, on March 8, 1990; and a temporary jobsite in offshore federal waters on March 18-21, 1990. The findings of this inspection were discussed with the radiation safety officer at the conclusion of the inspection.

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 inspector of personnel conducting licensed activities at a temporary jobsite.

The inspection included a review of training, qualification procedures, and field audits for logging supervisors; the receipt, use, inventory, transfer, and disposal of byproduct material and corresponding documentation; protective measures and radiation surveys associated with the transportation and use of tracer material in well logging; and survey and tracer injection equipment calibration, inspection, and maintenance programs. The inspector also reviewed records of the radiation safety audits that had been conducted at field offices and assessed the roles that management and the radiation safety officer (RSO) serve in directing licensed activities.

The inspector reviewed the actions you had taken with respect to the violations observed during three previous inspections conducted on November 15 and December 12, 1988, at the Parkersburg, West Virginia, facility; on January 9 and 12, 1989, at the Houston, Texas, corporate office; and on July 12, 1989, at the Casper, Wyoming, facility. The inspector observed that corrective actions had been implemented for those violations related to byproduct material inventory control and maintaining storage area radiation levels within required limits, as described in your letter dated April 19, 1989. Additionally, she observed that corrective action had been implemented for the violation that was

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C:NMISole
CLCain
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D:PASS
JABBeach
6/6/90

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identified at the Casper, Wyoming, facility. The inspector observed that your corrective actions have been effective in preventing further recurrence of these specific violations. Your corrective action regarding completion of shipping manifests for the transfer of radioactive waste was not reviewed, since no waste had been transferred during this inspection period. This item will be reviewed during a future inspection.

The inspector observed that corrective actions regarding contamination surveys of incoming packages of licensed materials had not been consistently followed by individuals conducting these surveys. Although she noted that the surveys had been routinely conducted, the results of these surveys had not been recorded in units of microcuries as required, in every case. This was reviewed with the RSO during this inspection who indicated that personnel would be re-instructed regarding this procedure.

Consequently, you are required to respond to this matter 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 inspector observed that otherwise, activities had been conducted in accordance with the license conditions and NRC regulations. She noted that you had engaged a physics consultant who has actively participated in the radiation safety program, and that his assistance in auditing program activities had been useful in identifying potential problems or items that required correction. During the inspector's observation of work conducted at an offshore job site, she noted that the individual conducting these activities was conscientious in observing radiation safety principles while handling tracer materials, and that he conducted several safety training sessions for production personnel associated with these activities.

The inspector also reviewed, with the RSO, several items which although they do not represent violations of NRC requirements, may require further attention. These were primarily related to waste storage area shielding, segregation of materials and items held in storage, and prevention of cross-contamination of injection equipment held for decay and future field use.

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 96-111.

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

Sincerely,



A. Bill Beach, Director
Division of Radiation Safety and
Safeguards

Enclosures:
Appendix - Notice of Violation

cc:
Texas Radiation Control Program Director

bcc:
DMB - Original (IE-07)
RDMartin
ABBeach
LAYandell
MRodriguez, OC/LFDCB (4503)
*CLCain
*WLFisher
*Inspector
*NMIS
*MIS System
*RIV Files (2)
*RSTS Operator
*REHall, URFO

*W/766

APPENDIX A

NOTICE OF VIOLATION

Pro-Technics International, Inc.
Houston, Texas

Docket: 30-30429/90-01
License: 42-26928-01

During an NRC inspection conducted on January 31 through March 21, 1990, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990) (Enforcement Policy), the violation is listed below:

10 CFR 20.401(b) requires, in part, that each licensee maintain records in the same units used in this part, showing the results of monitoring required by § 20.205(b). Section 20.205(b) describes the conditions under which incoming packages of radioactive materials must be monitored for removable contamination and specifies that the results of such surveys will be evaluated in units of microcuries per 100 square centimeters.

Contrary to the above, from April 19, 1989, through January 1990, the licensee had failed to maintain records of incoming package removable contamination surveys in unit of microcuries per 100 square centimeters.

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

Pursuant to the provisions of 10 CFR 2.201, Pro-Technics International, Inc., 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 7th day of June 1990