

SAFETY INSPECTION

1 LICENSEE Anadrill, Inc. 200 Macco Boulevard Sugar Land, Texas 77478		2 REGIONAL OFFICE U.S. Nuclear Regulatory Commission RIV 611 Ryan Plaza Drive Suite 1000 Arlington, Texas 76011	
3 DOCKET NUMBER(S) 30-29780/90-01	4 LICENSE NUMBER(S) 42-26877-01	5. DATE OF INSPECTION July 30, 1990	

Licensee

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission's (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews, with personnel, and observations by the inspector. The findings as a result of this inspection are as follows:

- 1. Within the scope of this inspection, no violations were observed.
- 2. The inspector also verified the steps you have taken to correct the violations identified during the last inspection. We have no further questions on those actions at this time.
- 3. During this inspection certain of your activities, as checked below, were in violation of NRC requirements.
THIS IS A NOTICE OF VIOLATION which is required to be posted in accordance with 10 CFR 19.11.

- A. _____ was not properly posted to indicate the presence of a _____ 10 CFR 20.203(b), (c), (d), (e) or 34.42.
- B. Containers located in _____ were not properly labeled to indicate the presence of radioactive material. 10 CFR 20.203(f)(1), or (f)(2).
- C. _____ of sealed sources were not performed at the proper frequencies. 10 CFR _____ License Condition Number _____
- D. Records of _____ were not properly maintained. 10 CFR _____ or License Condition Number _____
- E. Documents were not properly posted or otherwise made available. 10 CFR 19.11.
- F. Reports or notifications of _____ were not made in accordance with 10 CFR _____ or License Condition Number _____

H. Contrary to 10 CFR 20.203(f) a storage container at a temporary job site, which contained radioactive material was not posted "Caution, Radioactive Material."

- I. _____
- J. _____
- K. _____

9009250139 900814
REG4 LIC30
42-26877-01 PDC



I hereby state that within 30 days the actions described by me to the inspector will be taken to correct the violations identified in the items checked above. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201. No further response will be submitted unless required by the NRC.

<i>[Signature]</i> SIGNATURE - LICENSEE	4-Sept-90 DATE	<i>[Signature]</i> SIGNATURE - NRC INSPECTOR	8/14/90 DATE
--	-------------------	---	-----------------

CAUTION¹

RADIOACTIVE MATERIAL(S)

(f) *Containers.* (1) Except as provided in paragraph (f)(3) of this section, each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents.

(2) A label required pursuant to paragraph (f)(1) of this section shall bear the radiation caution symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL". It shall also provide sufficient information² to permit individuals handling or using the containers, or working in the vicinity thereof, to take precautions to avoid or minimize exposures.

(3) Notwithstanding the provisions of paragraph (f)(1) of this section labeling is not required:

(i) For containers that do not contain licensed materials in quantities greater than the applicable quantities listed in Appendix C of this part.

(ii) For containers containing only natural uranium or thorium in quantities no greater than 10 times the applicable quantities listed in Appendix C of this part.

(iii) For containers that do not contain licensed materials in concentrations greater than the applicable concentrations listed in Appendix B, Table I, Column 2, of this part.

(iv) For containers when they are attended by an individual who takes the precautions necessary to prevent the exposure of any individual to radiation or radioactive materials in excess of the limits established by the regulations in this part.

(v) For containers when they are in transport and packaged and labeled in accordance with regulations of the Department of Transportation.

(vi) For containers which are accessible³ only to individuals authorized to

¹ See footnote 1 to paragraph (b).

² As appropriate, the information will include radiation levels, kinds of material, estimate of activity, date for which activity is estimated, mass enrichment, etc.

³ For example, containers in locations such as water-filled canals, storage vaults, or hot cells.

handle or use them, or to work in the vicinity thereof, provided that the contents are identified to such individuals by a readily available written record.

(vii) For manufacturing or process equipment, such as nuclear reactors, reactor components, piping, and tanks.

(4) Each licensee shall, prior to disposal of an empty uncontaminated container to unrestricted areas, remove or deface the radioactive material label or otherwise clearly indicate that the container no longer contains radioactive materials.

[25 FR 10914, Nov. 17, 1960, as amended at 31 FR 10515, Aug. 5, 1966; 34 FR 19546, Dec. 11, 1969; 35 FR 5033, Mar. 25, 1970; 42 FR 64620, Dec. 27, 1977; 43 FR 2167, Jan. 15, 1978; 43 FR 22172, May 24, 1978]

§ 20.204 Same: Exceptions.

Notwithstanding the provisions of § 20.203,

(a) A room or area is not required to be posted with a caution sign because of the presence of a sealed source provided the radiation level twelve inches from the surface of the source container or housing does not exceed five millirem per hour.

(b) Rooms or other areas in hospitals are not required to be posted with caution signs, and control of entrance or access thereto pursuant to § 20.203(c) is not required, because of the presence of patients containing by-product material provided that there are personnel in attendance who will take the precautions necessary to prevent the exposure of any individual to radiation or radioactive material in excess of the limits established in the regulations in this part.

(c) Caution signs are not required to be posted at areas or rooms containing radioactive materials for periods of less than eight hours provided that (1) the materials are constantly attended during such periods by an individual who shall take the precautions necessary to prevent the exposure of any individual to radiation or radioactive materials in excess of the limits established in the regulations in this part and; (2) such area or room is subject to the licensee's control.

(d) A room or other area is not required to be posted with a caution

Attachment 4

§ 19.4 Interpretations.

Except as specifically authorized by the Commission in writing, no interpretation of the meaning of the regulations in this part by any officer or employee of the Commission other than a written interpretation by the General Counsel will be recognized to be binding upon the Commission.

§ 19.5 Communications.

Except where otherwise specified in this part, all communications and reports concerning the regulations in this part should be addressed to the Regional Administrator of the appropriate U.S. Nuclear Regulatory Commission Regional Office listed in Appendix D of Part 20 of this chapter. Communications, reports, and applications may be delivered in person at the Commission's offices at 2120 L Street, NW., Washington, DC, or at 11555 Rockville Pike, Rockville, Maryland.

[53 FR 6138, Mar. 1, 1988, as amended at 53 FR 43420, Oct. 27, 1988]

§ 19.8 Information collection requirements: OMB approval.

(a) The Nuclear Regulatory Commission has submitted the information collection requirements contained in this part to the Office of Management and Budget (OMB) for approval as required by the Paperwork Reduction Act of 1980 (44 U.S.C. 3501 et seq.). OMB has approved the information collection requirements contained in this part under control number 3150-0044.

(b) The approved information collection requirements contained in this part appear in § 19.13.

[49 FR 19624, May 9, 1984]

§ 19.11 Posting of notices to workers.

(a) Each licensee shall post current copies of the following documents:

(1) The regulations in this part and in Part 20 of this chapter;

(2) The license, license conditions, or documents incorporated into a license by reference, and amendments thereto;

(3) The operating procedures applicable to licensed activities;

(4) Any notice of violation involving radiological working conditions, pro-

posed imposition of civil penalty, or order issued pursuant to Subpart B of Part 2 of this chapter, and any response from the licensee.

(b) If posting of a document specified in paragraph (a) (1), (2) or (3) of this section is not practicable, the licensee may post a notice which describes the document and states where it may be examined.

(c) Each licensee and applicant shall post Form NRC-3, (Revision 6-82 or later) "Notice to Employees," as required by Parts 30, 40, 50, 60, 70, 72, and 150 of this chapter.

Note: Copies of Form NRC-3 may be obtained by writing to the Regional Administrator of the appropriate U.S. Nuclear Regulatory Commission Regional Office listed in Appendix D of Part 20 of this chapter.

(d) Documents, notices, or forms posted pursuant to this section shall appear in a sufficient number of places to permit individuals engaged in licensed activities to observe them on the way to or from any particular licensed activity location to which the document applies, shall be conspicuous, and shall be replaced if defaced or altered.

(e) Commission documents posted pursuant to paragraph (a)(4) of this section shall be posted within 2 working days after receipt of the documents from the Commission; the licensee's response, if any, shall be posted within 2 working days after dispatch by the licensee. Such documents shall remain posted for a minimum of 5 working days or until action correcting the violation has been completed, whichever is later.

[38 FR 22217, Aug. 17, 1973, as amended at 40 FR 8783, Mar. 3, 1975; 47 FR 30454, July 14, 1982; 52 FR 31610, Aug. 21, 1987]

§ 19.12 Instructions to workers.

All individuals working in or frequenting any portion of a restricted area shall be kept informed of the storage, transfer, or use of radioactive materials or of radiation in such portions of the restricted area; shall be instructed in the health protection problems associated with exposure to such radioactive materials or radiation, in precautions or procedures to minimize exposure, and in the purposes and