

Box 2444
Gillette, Wyoming 82716

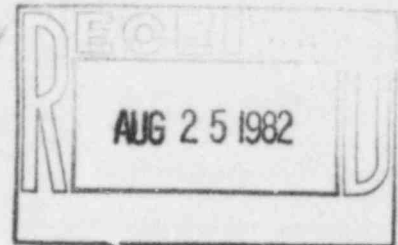


Telephone
(307) 682-3332

Service Oriented

AUGUST 20, 1982

U.S. NUCLEAR REGULATORY COMM.
REGION IV
611 RYAN PLAZA DR., SUITE 1000
ARLINGTON, TX 76012
ATTN: Glen D. Brown



RE: To Docket 30-13233

Dear Sir;

In response to your letter dated Aug. 4, 1982, Dyna Jet, Inc. has taken the following actions to correct the noncompliances found during Mr. R. Wise's inspection on June 26, 1982.

1.

(1) Corrective Steps:

Transportation certificate has been supplied to all transporting vehicles with description of Radio-nuclide, group, form, activity, type and category of package. This along with displaying placard visible on outside of transporting vehicle. ✓

Results:

All vehicles transporting material have carried this certificate from initial location to well site and back. ✓

(2) Corrective Steps:

All personnel are familiar with forms and each individual job is supplied with transportation certificate of radioactive material. ✓

(3) Full compliance:

As pertaining to inspection of June 26, 1982 by Mr. R. Wise, these transportation certificates were in full compliance by July 15, 1982. ✓

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NMS LIC30
49-17724-01 PDR

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Enclosed is transportation certificate for nuclear material form which we have incorporated.

2.

(1) Corrective Steps:

Dyna Jet personnel now use the Radioactive Contamination Inspection Data Sheet for all on the job radioactive usage. ✓

Results:

Use of this sheet has been 100% since its' incorporation. ✓

(2) Corrective Steps:

All tracer loggers have been informed of this usage sheet and adherence shall be maintained. ✓

(3) Compliance Date:

As pertaining to inspection of June 26, 1982 by Mr. R. Wise, these Data Sheets have been in full compliance since July 15, 1982. ✓

Enclosed is Radioactive Contamination Inspection Data Sheet for Dyna Jet, Inc.

3.

(1) Corrective Steps:

Records are now being kept by all Dyna Jet personnel to fully describe material such as bottles, cans, gloves, etc., which have come in contact with radioactive material. None of these articles are destroyed until the radioactive material has decayed to less than .2 mR/h. @ surface.

Results:

Results have proven satisfactory whenever material is destroyed by using victoreen survey meter proving that material has decayed to a safe low mR/h.

*discussed w/
licensee 9/15/82
.2 mR/h - assumed
to be Bk - no
readings - no
note - all trash
is Bk before
disposed.*

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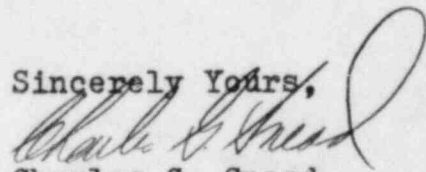
(2) Corrective Steps:

Records will be kept on all articles which come in contact with radioactive material. These will be stored in adequate safe storage until decay is well below standards. (No visible radiation.)

3. These steps were in full compliance by July 30, 1982.

We feel the corrective steps taken will keep Dyna Jet, Inc. within the rules of the Nuclear Regulatory Commission. If you have any other questions, please contact us.

Sincerely Yours,


Charles G. Snead

*Steps taken
to avoid fault
include
9/15/82*



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TEXAS 76012

AUG 04 1982

License: 49-17724-01

Dyna Jet, Inc.
ATTN: Mr. Les Desavedo
President
1807½ Echeta Road
Gillette, WY 82715

Gentlemen:

This refers to the routine safety inspection conducted by Mr. R. Wise of this office on June 26, 1982, of the activities authorized by the NRC Byproduct Material License 49-17724-01 and to the discussion of our findings held by the inspector with members of your staff 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.

Mr. Wise also reviewed the action you had taken with respect to six violations observed during our previous inspection, which was conducted December 6, 1978. He verified that the corrective action with respect to these items was implemented as stated in your replies of January 26, 1979, and March 5, 1979, to our letters dated January 10, 1979, and February 22, 1979.

During this inspection certain of your activities were found not to be conducted in full compliance with NRC requirements. Consequently, you are required to respond to this matter, in writing, in accordance with the provisions of Section 2.201 of the NRC "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 attached to this letter.

The responses directed by this letter and accompanying Notice are 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.

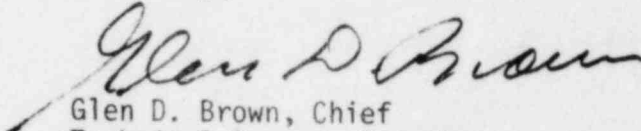
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Dyna Jet, Inc.

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

Sincerely,


Glen D. Brown, Chief
Technical Program Branch

Enclosure:
Appendix - Notice of Violation

APPENDIX

NOTICE OF VIOLATION

Dyna Jet, Inc.

Docket: 30-13233
License: 49-17724-01

As a result of the inspection conducted on June 26, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 71.5(a) requires, in part, that no licensee shall transport any licensed material outside the confines of his plant or other place of use, or deliver any licensed material to a carrier for transport unless the licensee complies with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation in 49 CFR Parts 170-189.
 - a. 49 CFR 172.200(a) requires, in part, that each person who offers a hazardous material on the shipping paper in the manner required by Subpart C of Part 172.

Contrary to this requirement, shipping papers were not provided for packages containing Type A quantities of radioactive material transported on public highways of the State of Wyoming during the period December 1978 to June 1982.

- b. 49 CFR 173.394(a)(1) requires, in part, that each shipper of a Specification 7A package must maintain on file a complete certification and supporting safety analysis demonstrating that the construction methods, package design, and materials of construction are in compliance with the specification.

Contrary to this requirement, the licensee did not have the Specification 7A package certification for Type A quantities of radioactive material transported on public highways in the State of Wyoming during the period December 1978 to June 1982.

D.P.C.
8208120120

- c. 49 CFR 173.398(a), Note 1, 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 safety analysis demonstrating that the special form material meets the requirements of paragraph (a) of that section.

Contrary to this requirement, the licensee did not have the certification for special form radioactive material transported on public highways in the State of Wyoming during the period December 1978 to June 1982.

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

2. License Condition 16 requires, in part, that licensed material be used in accordance with statements, representations, and procedures contained in the license application dated August 20, 1977.

Section 3.4 of the Radiation Safety Procedures Manual, submitted as part of the application dated August 20, 1977, states, in part, that a Radioactive Contamination Inspection Data Sheet would be completed for every tracer operation, and that copies of this form would be maintained on file.

Contrary to this requirement, no Radioactive Contamination Inspection Data Sheets were maintained for tracer operations completed during the period March 1979 to June 1982.

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

3. 10 CFR 20.401(b) requires, in part, that each licensee shall maintain records showing the results of surveys required by 10 CFR 20.301(b). 10 CFR 20.301(b) references 10 CFR 20.302 which describes the method for obtaining approval of proposed disposal procedures. Such procedures were submitted with the license application (Procedures Item 15) and are incorporated by reference in License Condition 16.

Contrary to these requirements, records of radiation surveys of waste for disposal were not maintained during the period December 1978 to June 1982.

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

Dyna Jet, Inc.

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Pursuant to the provisions of 10 CFR 2.201, Dyna Jet, Inc., is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including:

- (1) the corrective steps which have been taken and the results achieved;
- (2) the corrective steps which will be taken to avoid further violations; and
- (3) the date when full compliance will be achieved.

Consideration may be given to extending your response time for good cause shown.

Dated **AUG 04** 1982

DYNA JET, INC.

SERVICE ORDER NO. _____

DATE _____

RADIOACTIVE CONTAMINATION INSPECTION DATA SHEET

CUSTOMER
COMPANY _____ WELL _____
FIELD _____ COUNTY _____ STATE _____
PURPOSE OF SURVEY _____
TYPE SURVEY METER _____ SERIAL NO _____

SEALED SOURCES

CONDITION OF SOURCE: GOOD _____ NEEDS REPAIR _____

CONDITION OF
SOURCE SHIELD: GOOD _____ NEEDS REPAIR _____SURVEY READINGS: BEFORE LOG AFTER LOG

NORMAL BACKGROUND _____

STORAGE CONTAINER _____

TOOL _____

LOGGING UNIT _____

RIG FLOOR _____

TRANSPORT VEHICAL _____

PASSENGER COMPARTMENT _____

STORAGE AREA _____

TRACER MATERIAL

TRACER SUPPLIERS CODE _____ DATE _____

ISTOPE _____ ACTIVITY _____

BACKGROUND MEASUREMENT _____

GROUND AREA AROUND INJECTION EQUIPMENT _____

FLOW LINES FROM EQUIPMENT TO WELLHEAD _____

TRACER INJECTION TOOL _____

MIXING DEVICE OR TANK _____

PUMP _____

HAND TOOLS _____

GENERAL AREA _____

TRANSPORT VEHICAL _____

STORAGE AREA _____

ON JOBS USING SEALED SOURCES ONLY, THE CONTAMINATION LEVEL IS CONSIDERED TO BE TWICE THE NORMAL BACKGROUND READINGS FOR THAT LOCATION. REFER TO SECTION 7 FOR DETAILED INSTRUCTIONS ON MAKING SURVEY. IF LEVELS ARE FOUND THAT INDICATE CONTAMINATION, THE SUPPLEMENTARY RECORD ON BACK OF FORM MUST BE FILLED OUT.

ON JOBS USING TRACER MATERIAL THE CONTAMINATION LEVEL IS .2MR/HR AT 1/2" FROM GROUND OR OTHER OBJECT. REFER TO SECTION 7 FOR DETAILED INSTRUCTIONS FOR MAKING SURVEY. IF LEVELS ARE FOUND THAT INDICATE CONTAMINATION, THE SUPPLEMENTARY RECORD ON BACK OF FORM MUST BE FILLED OUT.

SIGNATURE: _____

DATE SURVEYED _____

DATE _____

TIME _____

DESTINATION _____

TRANSPORTATION CERTIFICATE FOR NUCLEAR MATERIAL

NATURE AND QUANTITY OF CONTENT					PACKAGE			
PROPER SHIPPING NAME	RADIOISOTOPE	GROUP	FORM	ACTIVITY		CATEGORY	TRANSPORT INDEX	TYPE
FOR U.S. SHIPMENTS, SEE SECTION 2, CAB 82, TARIFF 8-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID), or SPECIAL FORM, or SPECIAL ENCAPSULATION	NUMBER OF CURIES, or MILLI-CURIES	Number of Packages	I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B

I hereby certify that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, labelled and in proper condition for transportation according to applicable national government regulations.

Signature: _____

DATE _____

TIME _____

DESTINATION _____

TRANSPORTATION CERTIFICATE FOR NUCLEAR MATERIAL

NATURE AND QUANTITY OF CONTENT					PACKAGE			
PROPER SHIPPING NAME	RADIOISOTOPE	GROUP	FORM	ACTIVITY		CATEGORY	TRANSPORT INDEX	TYPE
FOR U.S. SHIPMENTS. SEE SECTION 2, CAB 82, TARIFF 6-D	NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	GROUP NUMBER OF GROUPS I TO VII	CHEMICAL, FORM AND PHYSICAL STATE (GAS/LIQUID/SOLID), or SPECIAL FORM, or SPECIAL ENCAPSULATION	NUMBER OF CURIES, or MILLI-CURIES	Number of Packages	I—WHITE or II—YELLOW or III—YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL or TYPE A, or TYPE B

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Signature: _____