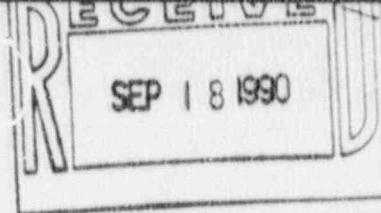




WIRELINE SERVICES, INC.



P.O. BOX 1934

ROCK SPRINGS, WYOMING 82901

(307) 382-5281

September 13, 1990

United States Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

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

Subject: License: 49-21178-01
Docket: 30-19877/90-01

Dear Sir:

In response to your letter dated August 21, 1990, I recognize the violations. My explanation and reason is as follows:

ITEM 1: Seal Source Testing

ITEM 2: Radiation Survey Instrument Calibration

I applied for a license renewal on August 29, 1987. The license had no previous violations; it had a clean record during our course of business since 1979.

Due to changes and new requirements to take effect after our renewal date, our renewal was delayed until we complied with the new requirements. After many months of correspondence to satisfy these requirements, I contacted a nuclear consultant for help and advice. I misinterpreted his advice not to do anything until we fully understood and agreed with the requirements. I ceased the inspections until the renewal was in effect.

The corrective steps I have taken are to resume the inspections and the survey instrument calibrations as of January 23, 1990. My corrective steps to avoid further violations will be to cooperate fully and review the NRC requirements much closer.

ITEM 3: Monitoring of R.A. Packages Receiver

ITEM 4: Labeling of Transportation Packages

I was unaware of item 3, the Type A, and identification number on the transportation packages. As corrective steps, I have studied the requirements, had inspection forms printed and properly labeled the transportation package.

I will pay closer attention to all the requirements. We are now in full compliance. Please inform me of any additional corrections necessary.

Yours truly

POMRENKE WIRELINE SERVICES, INC.

Nick E. Pomrenke
Radiation Safety Officer

9101030059 901224
REG4 LIC30 PDR
49-21178-01

NEP/rlp

CASED HOLE LOGGING

• JET PERFORATING

IE07

IC-90-274

INSPECTOR'S REPORT
Office of Inspection and Enforcement

INSPECTORS	
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LICENSEE/VENDOR <i>Pomona Wireless Service, Inc. P.O. Box 1934 Rock Springs, Wyoming 82701</i>	TRANSACTION TYPE X - INSERT M - MODIFY D - DELETE R - REPLACE	DOCKET NO. <i>03019877</i>	REPORT NO. <i>2001</i>	REPORT SEQ. <i>A</i>	MC. <i>07</i>	DAY. <i>9</i>	YR. <i>3</i>
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PERIOD OF INVESTIGATION/INSPECTION FROM: MC <i>07</i> DAY <i>12</i> YR <i>90</i> TO: MC <i>07</i> DAY <i>12</i> YR <i>90</i>	INSPECTION PERFORMED BY X 1 - REGIONAL OFFICE STAFF 2 - RESIDENT INSPECTOR 3 - PERFORMANCE APPRAISAL TEAM	OTHER	ORGANIZATION CODE OF REGION/HQ CONDUCTING ACTIVITY (See 15 MC 0530 Manpower Reporting - Weekly Manpower Reporting by Code) REGION <i>4</i> DIVISION <i>3</i> BRANCH <i>4</i>
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REGIONAL ACTION (Check one box only) 1 - NRC FORM 501 X 2 - REGIONAL OFFICE LETTER	TYPE OF ACTIVITY CONDUCTED (Check one box only) X 00 - SAFETY (fee) 01 - INCIDENT 02 - ENFORCEMENT 03 - MGMT AUDIT 04 - MGMT VISIT 05 - SPECIAL (fee) 06 - VENDOR 07 - MAT ACCT 10 - PLANT SEC 11 - BIVENT VER 12 - SHIPMENT/EXPORT 13 - IMPORT 14 - INQUIRY (no fee) 15 - INVESTIGATION
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INSPECTION INVESTIGATION FINDINGS (Check one box only) X 1 - CLEAR 2 - VIOLATION 3 - DEVIATION 4 - VIOLATION & DEVIATION	TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS A <i>0</i> B <i>4</i> C <i>0</i> D <i>0</i>	ENFORCEMENT CONFERENCE HELD A <i>0</i> B <i>0</i> C <i>0</i> D <i>0</i>	REPORT CONTAIN 278C INFORMATION A <i>0</i> B <i>0</i> C <i>0</i> D <i>0</i>	LETTER OR REPORT TRANSMITTAL DATE NRC FORM 501 OR REG LETTER ISSUED: MC <i>08</i> DAY <i>21</i> YR <i>90</i> REPORT SENT TO HQ FOR ACTION: MC <i>08</i> DAY <i>21</i> YR <i>90</i>
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MODULE INFORMATION										MODULE INFORMATION															
REC. ORD.	MODULE NUMBER INSP			PRIORITY	DIRECT REPORTING TO EFFORTS BY STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ FOLLOWUP			REC. ORD.	MODULE NUMBER INSP			PRIORITY	DIRECT REPORTING TO EFFORTS BY STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED TO DATE	STATUS	MODULE REQ FOLLOWUP						
TYPE	NUMBER	PHASE	MANUAL					CHAPTER	PROCEDURE	NUMBER	LEVEL	TYPE	NUMBER	PHASE					MANUAL	CHAPTER	PROCEDURE	NUMBER	LEVEL	TYPE	NUMBER
	<i>53</i>	<i>07</i>	<i>03</i>	A	<i>0.0</i>	<i>---</i>					<i>58</i>	<i>04</i>	<i>50</i>	A	<i>0</i>	<i>1.0</i>	C								
	management meetings							Inspection of Waste Generator Requirements																	
	<i>58</i>	<i>71</i>	<i>00</i>	A	<i>0.0</i>	<i>1.0</i>	C				<i>58</i>	<i>08</i>	<i>00</i>	A	<i>0</i>	<i>1.0</i>	C								
	licensed materials programs							initial inspection																	
	<i>58</i>	<i>38</i>	<i>22</i>	A	<i>0.0</i>	<i>1.0</i>	C				<i>59</i>	<i>27</i>	<i>02</i>	A	<i>0</i>	<i>0</i>									
	radiation protection							followup on violations																	
	<i>58</i>	<i>67</i>	<i>40</i>	A	<i>0.0</i>	<i>1.0</i>	C																		
	transportation																								

Mark through module numbers not reviewed. Fill in leading 0's for hours.

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

DOCKET NO. (8 digits) OR LICENSE NO. (27 PRODUCT) (13 digits)		REPORT		MODULE NUMBER	DATE	
NO.	SEC.	NO.	SEC.		MONTH	DAY
03019877		910	01	5877104		
			A	VIOLATION SEVERITY OR DEVIATION		DATE RELATED
			B	1	2	3
			C		X	
			D			
						6

VIOLATION OR DEVIATION (Enter up to 2400 characters for each row. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 80 characters each.)

1 Contrary to 39.25(c) the licensee had
 2 not leak tested the source, Gammitron, Inc.
 3 Model AN-HP, S/N C-012 during the
 4 1989.
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DOCKET NO. (8 DIGIT) OF LICENSE
 NO. (BY PRODUCT) (13 DIGIT)

REPORT

MODULE NUMBER

NO.

SEC.

51871/10101

**INSPECTOR'S REPORT
 (Continuation)**

Office of Inspection and Enforcement

03 019877

7001

A

VIOLATION SEVERITY

OR DEVIATION

TYPE

RELATED

SEC.

SUPP.

1 2 3 4 5 6 7 8 9 10

A C

B D

6

VIOLATION OR DEVIATION (ENTER UP TO 250 CHARACTERS PER COLUMN. IF TWO MORE COLUMNS ARE AVAILABLE, IT WILL BE NECESSARY TO REFORMAT/RE-ENTER DATA IN TO CHARACTER COLUMNS.)

1 Contrary to 10 CFR 39.27(a)(1), the licensee

2 did not calibrate ^{telemetry} ~~telemetry~~ instrument

3 between 497 SA 3791, at the required

4 6 month interval for the period 1/1/89 to

5 2/26/90.

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

DOCKET NO. (8 DIGITS) OR LICENSE NO. (BY PRODUCT) (10 DIGITS)

03019A77

REPORT

NO

BEO

41001

MODULE NUMBER

518718121

VIOLATION SEVERITY OR DEVIATION

1 2 3 4 5 6 D

X

BY RELATED SUP.

A C

B D 4

VIOLATION OR DEVIATION LEAD UP TO 2000 characters for each item. If the NRC requires the licensee to take any necessary action, list such in 20 characters each.

1 Contrary to 10CFR 20.401(b), the licensee did not maintain ^{direct and} survey records of incoming shipment or their gross (w/p) survey records.

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NRC FORM 788 A
1-81
E MC 0638

DOCKET NO. (8 DIGITS) OR LICENSE
NO. (BY PRODUCT) (12 DIGITS)

REPORT

MODULE NUMBER

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

031019877

9201

581674101

NO

SEC

A VIOLATION SEVERITY
OR DEVIATION

TYPE
RELATED

SUP.

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D

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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 20 characters each.)

1 Contrary to 10CFR 91.5 (42CFR 172.200),
2 the licensee's Shipper was not marked
3 properly. (No RQ, UN No, and Typed)

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AUG 21 1990

In Reply Refer To:
License: 49-21178-01
Docket: 30-19877/90-01

Pomrenke Wireline Services, Inc.
ATTN: Nick E. Pomrenke
Radiation Safety Officer
P.O. Box 1934
Rock Springs, Wyoming 82901

Gentlemen:

This refers to the routine, unannounced radiation safety inspection conducted by Mr. Wesley Holley of this office on July 12, 1990, of the activities authorized by NRC Byproduct Material License No. 49-21178-01, 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.

The inspector determined that your radiation safety officer (RSO) was the logging supervisor for all activities utilizing licensed radioactive material during this inspection period, June 17, 1987, through July 12, 1990. The inspector noted that your logging equipment appeared to be in adequate condition and observed the loading of the neutron source into a transport package with source handling tools. He also observed that the RSO and other licensee personnel appeared to have effective communication among themselves concerning program requirements. He noted that your activities were minimal for this inspection period in that you performed only ten jobs using licensed materials.

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'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.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC Public Document Room.

*RIV:NMIS	*C:NMIS	*D:DRSS
WLHolley:nh	CLCain	ABBeach
/ /90	/ /90	/ /90

*Previously Concurred

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IE-07

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 96-511.

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

Sincerely,

Original Signed By:

A. B. BEACH

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

Enclosure.
Appendix + Notice of Violation

cc:
Wyoming Radiation Control Program Director

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

*W/766

APPENDIX
NOTICE OF VIOLATION

Pomrenke Wireline Services, Inc.
Rock Springs, Wyoming 82901

Docket: 30-19877/90-01
License: 49-21178-01

During an NRC inspection conducted on July 12, 1990, violations of NRC requirements were 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 violations are listed below:

1. 10 CFR 39.35(c) requires each sealed source to be tested at intervals not to exceed 6 months. In the absence of a certificate from a transferor that a test has been made within the 6 months before the transfer, the sealed source may not be used until tested.

Contrary to the above, the licensee had not leak tested a Gammatron sealed source Model AN-HP, Serial No. C-012, from December 28, 1988, through January 23, 1990. This source had been used during this period.

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

2. 10 CFR 39.33(c)(1) requires the licensee to have each radiation survey instrument required under paragraph (a) of this section calibrated at intervals not to exceed 6 months and after instrument servicing.

Contrary to the above, the licensee had not calibrated a radiation survey instrument, Victoreen Model 493, Serial No. 3391, from January 6, 1989, to February 26, 1990. This instrument had been used during this period.

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

3. 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 of packages required by 10 CFR 20.205(b) and (c).

Contrary to the above, records were not maintained showing the results of the monitoring of packages received from June 17, 1987, through July 12, 1990.

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

4. 10 CFR 71.5(a) requires each licensee who transports licensed material outside of the confines of its plant or other place of use, or who delivers licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of DOT in 49 CFR Parts 170 through 189.

49 CFR 172.300(a) requires that each person who offers a hazardous material for transportation shall mark each package, freight container,

~~9008280181~~

and transport vehicle containing the hazardous material in the manner required by this subpart.

Contrary to the above, the licensee's transportation package was not marked properly as of July 12, 1990. The markings did not include a Type A designation and an identification number.

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

Pursuant to the provisions of 10 CFR 2.201, Pomrenke Wireline Services, 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 21st day of August 1990