

NOTICE OF VIOLATION

Flo-Log, Inc.
14101 Orange Avenue
Paramount, California 90723

Docket No. 15000004
California License No.
4204-70

During an NRC inspection conducted on December 13-14, 1990 and January 14-15, 1991, of activities carried out under the general license provisions of 10 CFR 150.20, at the Hondo offshore oil platform and at the licensee's facility in Paramount, California, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Action," 10 CFR 2, Appendix C (1990), the violations are listed below:

10 CFR 150.20(b)(1) in part provides that any person holding a specific license from an Agreement State, and who engages in activities in non-Agreement States or areas under Federal jurisdiction under a general license established by 10 CFR 150.20, is subject to the provisions of 10 CFR 19, 20, 30.41, 30.51, and 71. Also, 10 CFR 150.20(b)(4) requires any person operating under the general license to comply with all terms and conditions of the specific license issued by the Agreement State. Flo-Log, Inc. possesses a current Agreement State license (No. 4204-70) from the State of California to perform tracer studies and well logging activities.

- A. 10 CFR 150.20(b)(1) provides that any person who engages in activities in Non-Agreement States or in areas under exclusive Federal jurisdiction under a general license, shall submit copies of NRC Form 241, "Report of Proposed Activities in Non-Agreement States" and the Agreement State specific license with the appropriate Regional Office in which the activity is to take place, at least three days prior to the start of such activity.

Contrary to the above, between February 20, 1988 and October 24, 1990, the State licensee failed to notify the NRC prior to using millicurie quantities of iodine-131 on at least 50 separate occasions at five offshore oil platforms that were under Federal jurisdiction.

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

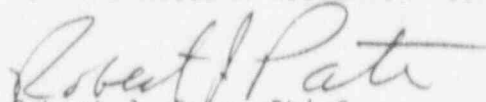
- B. License Condition 13.(a) requires in part that the licensee possess and use radioactive material described in the license in accordance with statements, representations and procedures contained in the letter dated March 22, 1983, with attached application dated March 4, 1983. Attachment 2 of the application dated March 4, 1983, requires radiation survey meters to be calibrated at six month intervals.

Contrary to the above, a radiation survey instrument (Bicron Model 50, S/N A521G) used by the licensee to make radiation surveys on December 13-14, 1990 at the Hondo offshore oil platform, was last calibrated on March 6, 1990, an interval exceeding six months.

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

Pursuant to the provisions of 10 CFR 2.201, Flo-Log, Inc., Paramount, California is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region V, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

FOR THE NUCLEAR REGULATORY COMMISSION


Robert J. Pate, Chief
Nuclear Materials and Fuel
Fabrication Branch

Dated at Walnut Creek, California
this 31st day of January 1991