

COMPUTALOG
WIRELINE SERVICES INC.

May 18, 1994

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: **Reply to a Notice of Violation**
Docket No. 030-30118
Licence: 42-26891-01

Dear Sirs:

In response to the referenced document dated May 4, 1993 and signed by Mr. Samuel J. Collins, Director of the Division of Radiation Safety and Safeguards of the Region IV office of the U.S. Nuclear Regulatory Commission in Arlington, Texas, Computalog Wireline Services, USA would like to submit the following reply to the Commission concerning the Violations noted in the Appendix of that document (enclosed).

- A. Failure to meet License Condition 17 concerning annual inspections on-the-job performance of each logging supervisor.
- (1) Additional research into the radiological training files of the three logging supervisors in the Moore, Oklahoma district for the year 1991 failed to produce any supporting evidence to the contrary, and therefore Computalog cannot dispute the violation noted.
 - (2) Corrective steps that have been taken was the re-evaluation of the inspection program by this office when changes to the current Corporate Radiation Safety Officer were implement in March of 1993.

In that year, the Special Field Evaluation for Computalog Logging Supervisors was conducted in conjunction with a very aggressive radiological training program based on the anticipated NRC Regulation changes, particularly Part 20.

A copy of the Evaluations on the supervisors currently operating under NRC jurisdiction in the Outer Continental Shelf were provided to the Region IV inspector, Mr. Richard Leonardi, Jr. in a letter dated April 22, 1994.

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(3) Corrective steps that have been developed and will continue to be taken to avoid further violations are:

1. Establishment of the Master Training Database that identifies required training for each radiological supervisor and logging assistant and tracks the compliance dates of training.
2. Establishment of the Station Safety Coordinator (a qualified District Radiation Safety Officer and authorized Logging Supervisor) that will assist in coordinating supplemental and enhanced radiation safety training and inspections at the district levels.

(4) We have achieved 100% compliance on this issue for 1993 and are scheduling Evaluations for all of these supervisors throughout the year. To date we have conducted 6 evaluations out of 32 supervisors (19%). Compliance on this issue will be completed no later than by the end of the year and probably before the end of August, 1994 with the aid of the SSC's.

B. Failure to meet 10 CFR 39.61(c) concerning annual safety reviews for each logging supervisor note in the Moore, Oklahoma district.

(1) Additional research into the radiological training files of the three logging supervisors in the Moore, Oklahoma district for the year 1991 failed to produce any supporting evidence to the contrary, and therefore Computalog cannot dispute the violation noted.

(2) Corrective steps that have been taken was the re-evaluation of the Radiation Safety program by this office when changes to the current Corporate Radiation Safety Officer were implemented in March of 1993.

In my Special Field Evaluations of Logging Supervisors in 1993, a safety review was conducted as part of the evaluation (even though they demonstrated acceptable skills and knowledge) as part of the exit interview. No specific safety test or documentation was initiated beyond this review. We had 100% participation on these reviews as noted in "A" above.

(3) The 1994 Computalog Safety Training season will avoid further violations, improve documentation of radiological safety training by several means:

1. Via the Station Safety Coordinators (District RSO's) and the training initiatives such as the one outlined in the enclosed January 24th Memo for Radiation Safety Awareness Month.
2. Three scheduled 40 hour Radiation Well Loggers Safety Courses in 1994. We have scheduled 100% participation of all Logging Supervisors in this program. We currently have 19% of our logging supervisors completing this course.
3. The use of Logging Assistant and Logging Supervisors Tests (Level I & II) in addition to the annual Field Evaluations to improve skills and knowledge of radiological safety in our operations.

(4) Full compliance on this issue is on schedule will be completed annually as required, with proper documentation as noted.

B. Failure to meet License Condition 17 concerning the disposal of unused radioisotopes prior to the 10 half-lives required, in part, by this condition.

- (1) Computalog cannot dispute the violation noted. This action is contrary to established procedure and practice. Without interviews of the persons responsible (terminated when base was closed in 1992), we can only speculate why this violation occurred.
- (2) Corrective steps that have been taken is the re-emphasis on this disposal procedure in specialized training for the Station Safety Coordinator (qualified District Radiation Safety Officer) that is tasked with the disposal of the decayed-out radioisotope and subsequent documentation. This occurred in October of 1993.
- (3) To avoid this violation in the future, the disposal procedure carries special emphasis in the 16 hour Radiation Safety for Tracers portion of our 40 hour Well Loggers Radiation Safety Course being conducted this year that includes practical tests in problems calculating the remaining half-life of any licensed radioisotope, the particular regulations (Federal, State and Local) governing the disposal of this material and other related subjects.

- (4) All Station Safety Coordinators (District Radiation Safety Officers) will be directed to conduct a general review of the regulations on this and the other violations in the next monthly (June 1994) Safety Meeting. This will insure 100% compliance by July, 1994. See enclosed Safety Alert.

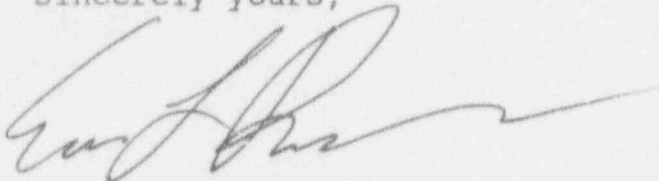
In summary, Computalog Wireline recognizes these violations made in the closed district and have taken steps to eliminate the possibility of reoccurrence through a proactive, aggressive training program that began in early 1993. The current radiological safety program keys on a comprehensive 40 hour school that incorporates the general 24 hour well loggers curriculum with an additional 16 hours of tracer safety and operational procedure.

It is our goal to take the leadership position for radiation safety in our industry and we believe that is a very achievable goal.

A copy of this Reply will be forwarded to the Regional Administrator, Region IV as per instructions.

Please direct any inquiries you may have for clarification or augmentation to myself or the General Manager, Dale Boudreaux at the address shown. Thank you for your time and consideration.

Sincerely yours,



Eric L. Rosemann
Corporate Radiation Safety Officer
Computalog Wireline Services, USA

cc: Dale Boudreaux
Martin Kemp
NRC Region IV Administrator
NRC 94 Audit File

Enclosures:
Appendix from Docket 030-30118
Memo of January 24, 1994
Safety Alert Directive

APPENDIX

NOTICE OF VIOLATION

Computalog Wireline Services, Inc.
Houston, Texas 77060

Docket: 030-30118
License: 42-26891-01

During an NRC inspection conducted on April 12-14, 1994, 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, the violations are listed below:

- A. 10 CFR 39.13(d) requires, in part, that an applicant establish and submit to the Commission its program for annual inspections on-the-job performance of each logging supervisor.

License Condition 17 incorporates the inspection program containing the requirements of 10 CFR 39.13(d) as submitted in the licensee's application dated December 7, 1987, and letter dated December 29, 1987.

Contrary to the above, as of April 14, 1994, job performance inspections for three logging supervisors who had worked at the Moore, Oklahoma facility had not been performed during calendar 1991.

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

- B. 10 CFR 39.61(c) requires, in part, that a licensee provide safety reviews for logging supervisors at least once during each calendar year.

Contrary to the above, the licensee failed to provide safety reviews for three logging supervisors who had worked at the Moore, Oklahoma facility during calendar 1991.

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

- C. License Condition 17 requires, in part, that the licensee conduct its program in accordance with the statements, representations, and procedures contained in the application dated December 7, 1987.

Item 11 of the application specifies, in part, that an unused radioisotope with short half-life shall remain in storage until the material has decayed a minimum of 10 half-lives.

Contrary to the above, three vials of liquid iridium-192 (half-life of 74 days) waste dated April and May 1990 were disposed of as nonradioactive material on February 28, 1992, a period less than 10 half-lives.

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

Pursuant to the provisions of 10 CFR 2.201, Computalog Wirelines Services, Inc., is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington,

COMPUTALOG
WIRELINE SERVICES INC.

I N T E R O F F I C E C O R R E S P O N D E N C E

DATE: January 24, 1994

TO: District RSO'S

FROM: Eric Rosemann - Safety & Compliance

RE: Radiation Safety Awareness Month

Gentlemen:

For the month of February's safety topic, I want the RSO's of each district to issue the basic radiation safety test enclosed (Logging Assistant) to all field personnel.

This can be taken open-book with the R/A manuals issued recently (Remember those? The ones each man is supposed to sign off on and give to you and me?).

Give this test as part of your safety meetings this month. Take a section of the test each week to discuss and answer as a group. Call on others to answer, don't lecture. Encourage participation. Have them write the answers on the test and repeat the answer again to "lock it down".

Make it your goal this month to get 100% participation on the test and discussions. Grade the test and send me a copy of the graded answer sheet in the safety pack for February. If you miss anyone, send me their names and pick them up in March.

Remember, work with your people to get the right answers at their learning pace. It is more important to make them more aware of Radiation Safety and make it real to them than it is to simply take a test.

Note: Also use this time to emphasize the paperwork needed for each job and how this impacts on performance and bonus.

Thanks for your help.



Eric L. Rosemann
Safety & Compliance Manager



COMPUTALOG SAFETY ALERT

N.R.C. VIOLATIONS

All Field Personnel are directed to read and discuss the attached Appendix from the NRC that outlines the 3 violations and our Reply from our inspection of April 12-14, 1994.

SSC's are directed to explain the 10 half-life disposal requirements, reiterate that only the SSC will dispose of decayed radioisotopes in the district at the direction of the Safety Manager.

Please confirm this discussion by 100% of the radiological workers in your district by signature on the June Safety Meeting, SAF-1