

APPENDIX

NOTICE OF VIOLATION

Robco Production Logging, Inc.
Snyder, Texas

Docket No. 150-00042/90-04
License No. General License
(10 CFR 150.20)

During an NRC inspection conducted on November 26, 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), the violations are listed below:

10 CFR 150.20(b) requires, in part, that any person engaging in activities in non-Agreement States under the general license provided in Section 150.20 shall comply with all terms and conditions of the specific license issued by an Agreement State.

Texas Radioactive Material License No. L03549, License Condition 17 requires, in part, that the licensee shall possess and use radioactive material authorized by this license in accordance with statements, representations, and procedures contained in the Texas Regulations for Control of Radiation (TRCR).

- A. TRCR Part 36.403 requires, in part, that each licensee conducting well servicing operations at a temporary job site shall have the following records available at that site for inspection by the Agency: (1) operating and emergency procedures, and (2) when operating in the State under reciprocity pursuant to 41.90 or 42.10, a copy of the appropriate license.

Contrary to the above, a copy of the Texas License No. L03549 and a copy of the operating and emergency procedures were not available at the time of the inspection.

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

- B. 10 CFR 71.5(a) requires, in part, that licensees who transport licensed material outside the confines of its plant or other place of use, or who deliver licensed material to a carrier for transport, shall comply with the applicable requirements of the regulations appropriate to the mode of transport of the Department of Transportation (DOT) in 49 CFR, Parts 170-189.

1. 49 CFR 172.200(a) requires, in part, that each person who offers a hazardous material for transportation shall describe the hazardous material on the shipping paper. 49 CFR 172.101 defines radioactive material as a hazardous material.

Contrary to the above, a copy of the appropriate shipping papers for the 20 millicuries of I-131 transported by the licensee was not available at the time of the inspection.

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

2. 49 CFR 172.310 requires, in part, that each package of radioactive material which conforms to the requirements for Type A or Type B packaging must be plainly and durably marked on the outside of the package in letters at least 1/2-inch high with the words "Type A" or "Type B" as appropriate.

Contrary to the above, the transport container being used by the licensee at the time of the inspection to transport licensed quantities of radioactive material not exceeding Type A quantities was not labeled as "Type A" as required.

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

Pursuant to the provisions of 10 CFR 2.201, Robco Production Logging, 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 24th day of December 1990