

Mr. Jason VonEhr
Health Physicist
U.S. Nuclear Regulatory Commission, Region-IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Subject: NRC Inspection 030-39167/2020-001 Response – May 28th, 2020

Dear Mr. VonEhr:

I am writing in response to the notice of violation letter we received from you on April 2nd with the amended copy coming on April 6th. The two violations address the failure to meet sufficient training that meets the criteria in Section 8.7.2 of the NUREG-1556 and failure to meet criteria in Section 8.10.6. Some of the specifics of the criteria that was not meant were highlighted in the NUREG documents and was sent to us via email on February 11th, 2020. It is Element Technical Services goal to address these specific areas in our training, operation manual, and procedures to meet the criteria in Section 8.7.2 and Section 8.10.6 in the NUREG-1556 manual.

In order to meet these criteria, Element plans to analyze the existing training, O&E manual, and procedures and identify the areas that need to be approved as well as potential corrective actions. After the areas have been identified, it is our intent to correct each topic to be in compliance with the criteria in Section 8.7.2 and 8.10.6. To do this, it is our plan to work with a third-party radiation compliance company in an effort to thoroughly audit and correct our current training, O&E manual, and procedures. Due to the current collapse of the world oil and gas market combined with the restrictions due to COVID-19, we plan to correct these actions as soon as reasonably achievable. With so much uncertainty and change we do not feel that a commitment to addressing some of the violations by a certain date is feasible. Our hope is to meet with our team and a third-party company to address and correct the violations. However, due to the limits on travel as well as assembling large groups that would be necessary for extended training, we believe these restrictions could prolong the ability for our employees and procedures to be corrected. With that said we are making efforts to move forward with correcting and improving some of the things in our training program, O&E manual, and procedures.

Sincerely,

Travis Wyatt

Travis Wyatt

Radiation Safety Officer
Element Technical Services