

April 22, 2022

Reply to a Notice of Violation; EA-22-014

GIR SOLUTIONS LLC. NOTICE OF VIOLATION; NRC INSPECTION
REPORT 150-00017/2022-001

Violations:

10 CFR 30.3(a) requires, in part, that no person shall receive, acquire, own, possess, or use byproduct material except as authorized in a specific or general license issued in accordance with the regulations in 10 CFR Chapter I.

10 CFR 150.20(a)(1) requires, in part, that any person who holds a specific license from an Agreement State is granted a general NRC license to conduct the same activity in offshore waters subject to the provisions of 10 CFR 150.20(b).

10 CFR 150.20(b)(1) requires, in part, that any person engaging in activities in offshore waters shall, at least 3 days before engaging in each activity for the first time in a calendar year, file a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the appropriate NRC regional office.

Contrary to the above, on January 31, 2022, GIR Solutions, LLC, a licensee of the State of Louisiana, engaged in activities in offshore waters without filing a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the NRC Regional Office at least 3 days before engaging in each activity for the first time in a calendar year. Specifically, GIR Solutions, LLC, transported and stored radioactive material at Offshore Waters in the Gulf of Mexico on January 31, 2022 in anticipation of beginning work, but did not submit an NRC Form 241, a copy of its Agreement State radioactive materials license, and the appropriate fee until January 31, 2022, allowing the NRC to approve the initial reciprocity request on February 1, 2022. Since the material was transported to and stored in offshore waters beginning on January 31, 2022, the licensee was required to provide this information to the NRC by January 28, 2022.

Reply to a Notice of Violation; EA-22-014

1) The reason for the violation:

The reason the violation took place:

January 31, 2022, GIR Solutions, LLC, a licensee of the State of Louisiana, engaged in activities in offshore waters without filing a submittal containing an NRC Form 241, "Report of Proposed Activities in Non-Agreement States," a copy of its Agreement State specific license, and the appropriate fee with the Regional Administrator of the NRC Regional Office at least 3 days before engaging in each activity for the first time in a calendar year. Specifically, GIR Solutions, LLC, transported and stored radioactive material at Offshore Waters in the Gulf of Mexico on January 31, 2022 in anticipation of beginning work, but did not submit an NRC Form 241, a copy of its Agreement State radioactive materials license, and the appropriate fee until January 31, 2022, allowing the NRC to approve the initial reciprocity request on February 1, 2022. Since the material was transported to and stored in offshore waters beginning on January 31, 2022, the licensee was required to provide this information to the NRC by January 28, 2022.

I, Isaac Thibodeaux RSO for GIR Solutions mistakenly confused the NRC calendar year with the date we originally submitted the first NRC form 241. GIR made initial payment on 05-12-2021. I had the date marked to pay 1 year from that date, due to this I submitted the NRC form 241 "Report of Proposed Activities in Non-Agreement States," as usual and I allowed the crew to mobilize offshore. This is the reason for GIR's failure to file an initial NRC Form 241, and pay the required reciprocity fee, prior to performing licensed activities in Federal jurisdiction for calendar year 2022.

(2) The corrective steps that have been taken and the results achieved:

GIR Solutions LLC submitted the NRC Form 241 the day before the material arrived on the jobsite and no work was performed until the NRC provided the licensee reciprocity approval; therefore the NRC had the opportunity to inspect the licensee prior to work completion; (2) GIR Solutions LLC had only had been a reciprocity licensee for one year and misunderstood the yearly reciprocity requirements; and (3) the licensed activities were performed in offshore waters, thereby limiting security access concerns, as well as potential for exposure and contamination to members of the public.

(3) the corrective steps that will be taken

A meeting was held with myself "Isaac Thibodeaux" and my supervisor "Jeremy Johnson" on April 7th. At this time we discussed the violation and set the correct calendar reminders to ensure that we file NRC form 241, a copy of GIR's Agreement State radioactive materials license and pay the appropriate fees at least 3 days before engaging in each activity for the first time in a calendar year. We now have yearly reoccurring alerts on our work calendar and our mobile phones starting on November 7th to ensure we have plenty of time for approval and to ensure this does not happen again.

(4) The date when full compliance will be achieved.

Full compliance has been achieved since February 1st, 2022



228 Jared Dr.
Broussard, LA 70518
(337) 252-7354

This concludes my response.

Sincerely, Isaac Thibodeaux

Isaac Thibodeaux
4-22-22