Hi Austin,

The letter for the audit plan is attached and the plan is included as well. Please let me know if you need anything else at this time. Otherwise, we await the NRC response and will continue to submit other deliverables from the Order.

Regards,

Pete

Pete Hernandez
Radiation Safety Manager
ProTechnics, a Division of Core Laboratories
M: 346.391.4558 | Pete.Hernandez@corelab.com
6510 West Sam Houston Parkway N.
Houston, Texas 77041

From: Austin Roberts <Austin.Roberts@nrc.gov>
Sent: Thursday, November 30, 2023 7:06 AM
To: Pete Hernandez <Pete.Hernandez@corelab.com>
Subject: FW: Corrective Actions and Audit Plan from ProTechnics

Good morning Pete,

See below: our technical branch (DRSS/MIB) needs your audit plan to be attached to a letter signed by your management (or a representative of management).

Best,
Austin

ProTechnics
6150 W Sam Houston Parkway North
Houston, TX 77041 USA
Tel: 713-328-2321
www.corelab.com

November 30, 2023

Tamara Bloomer, Director
Division of Radiological Safety and Security
Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd.
Arlington, TX 76011-4511

Subject: Audit Plan Related to Commitments Made in ADR Settlement Agreement for ProTechnics

Dear Ms. Bloomer,

ProTechnics Division of Core Laboratories LP (ProTechnics) submitted the attached audit plan on October 12, 2023, in partial fulfillment of the commitments made during the Alternative Dispute Resolution (ADR) session held on October 11, 2023. The action required was for ProTechnics to submit an Audit Plan for NRC review and approval within 30 days of issuance of the Confirmatory Order, which was issued on November 28, 2023. We are requesting an expedited review of the Audit Plan, if possible, because prior to the ADR session ProTechnics proactively engaged a third-party company, NV5 – formerly Dade Moeller, to perform a comprehensive audit of our radiation safety program. While they are performing the audit in accordance with the appropriate volumes of NUREG-1556, we would like NV5 to incorporate any Audit Plan changes in their ongoing audit rather than beginning a new one.

Thank you for your consideration, and we look forward to your response.

Sincerely,

Don Dumas
President
ProTechnics, a Division of Core Laboratories LP

Enclosure

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October 11, 2023

Audit Plan for NV5 Global

NV5 will perform a combination of virtual and in-person radiation protection program audits of the various ProTechnics' radioactive material licenses currently in place across the United States. Virtual audits will be conducted remotely without the need for physical on-site tours. In-person audits will be conducted at 5 'major' Core facilities located in the States of Louisiana, New Mexico, and Texas. All audits will, at a minimum, follow the guidance provided in U.S. Nuclear Regulatory Commission guidance document NUREG-1556, Volume 14, Appendix E. The scope of work (SOW) for each audit will consist of:

1. Preparation – Review of the site's license, license application, applicable state and/or NRC regulations, and ProTechnics corporate or license-specific radiation safety protocols. The auditor will contact the site Radiation Safety Officer to discuss general program status and identify any specific areas of concern prior to initiating audit activities. In general, following this task, the auditor will compare audit observations to the radiation safety requirements established in the license and applicable regulations.

2. Audit – Follow the guidance provided in Appendix E of volume 14 of NUREG-1556; deviate from the guidance, as appropriate. Audit activities include a comprehensive review of the radiation safety program records and interviews with key radiation safety staff and persons who work with licensed radioactive sources. In-person audits will also include a tour of facilities allowing the auditor to observe the areas used for activities under the license and an opportunity to speak to persons encountered about the ProTechnics' radiation safety program as it pertains to individual work assignments.

3. Audit Report – Provide to ProTechnics and site RSO after completion of audit activities. Audit reports will not only prioritize findings of potential non-compliance, but also include program improvement recommendations for ProTechnics' radiation safety staff to take under consideration, the objective being to offer recommendations that will improve the quality of the ProTechnics' radiation safety program and assist all RSO's in their ability to manage licensed activities.

The work will be staffed by a team of senior level health physicists, each with decades of radiation safety experience having a graduate degree and/or certification in health physics from the American Board of Health Physics.