



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064**

September 29, 2000

Gulf Coast International Inspection, Inc.
ATTN: Rory J. Bergeron
Radiation Safety Officer
227 Clendenning Road
Houma, Louisiana 70363

SUBJECT: EXEMPTION GRANTED FROM 10 CFR 34.20(A)(1)

This letter is in response to your letters dated November 16, 1999; December 2, 1999; and December 15, 1999, seeking an exemption from 10 CFR 34.20(a)(1) in order to use SPEC Model SPEC-CHECK II and Gamma Industries Pipeliner Model I and 201 exposure devices for offshore radiography activities on lay barges in the Gulf of Mexico under Federal jurisdiction.

Based on the information submitted regarding the need for the exemption; your assurance that all reasonable alternatives for complying with the regulations have been exhausted and that compensatory safety measures will be strictly adhered to; and on the environmental assessment and finding of no significant impact (65 FR 52139, August 29, 2000), the staff has determined that this exemption would not endanger life or property or the common defense and security and is otherwise in the public interest and should, therefore, be granted.

Notwithstanding the requirements of 10 CFR 34.20(a)(1), and pursuant to 10 CFR 34.111 and 10 CFR 150.20, Gulf Coast International Inspection, Inc., is authorized to use SPEC Model SPEC-CHECK II and Gamma Industries Pipeliner Model I and 201 exposure devices for conventional pipeline radiography operations on lay barges in Federal jurisdiction in the Gulf of Mexico. When conducting radiography operations you must comply with the commitments provided in your abovementioned correspondence and the pipeliner procedure checklist received January 26, 2000, which include, but are not limited to, the following limitations on the use of the devices:

1. Devices shall be secured using chains, binders, and safety lines to prevent them from accidentally falling from pipes being radiographed;
2. The maximum height at which a device is operated shall be limited to 4 feet 6 inches above the barge deck;
3. Except on the occasions when the barge is small and space is limited, and the configuration of the pipe limits space and/or more than one line of pipe is being laid, a 6 foot crankout or a 6 foot hose with a rod down the center shall be connected to the on/off knob to minimize personnel exposure; and
4. Each device shall be under constant surveillance during use or shall be stored in a locked and secured area.

Gulf Coast International Inspection, Inc.

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If you have questions concerning this letter or other aspects of working in NRC jurisdiction, please contact Christi Hernandez at (817) 860-8217.

Sincerely,

/RA/

Dwight D. Chamberlain, Director
Division of Nuclear Materials Safety

cc: Mike Vince, Administrator (Permitting)
Department of Environmental Quality
Office of Environmental Services
P.O. Box 82135
Baton Rouge, LA 70884-2135

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