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ISO 9001 Certified

Houma, Belle Chasse, Amelia, Lafayette, Houston, Carthage, TX Rifle, CO. Tuscaloosa, Ala.

Good Afternoon Ms. Roldan

NVI, LLC would like the following amendments to our Radioactive Material License number 17-29410-01.

1. We would like to change our physical address from 901 Oak Street, Houma LA to our new address 2449 West Park Avenue, Gray, LA. 70359.
2. We would like to add lay barge radiography to our license.

I have included our lay barge Operating and Emergency procedures for review. These procedures are specific for performing radiography on lay barges and are just one section of NVI's complete Operating and Emergency Procedures. I did not include the entire procedure manual since I had previously submitted it during the initial application. I you would like a complete copy just let me know.

If you have any questions or need more information you can contact me electronically at paul@nvindt.com or at 985-876-5559.

Thank you for your help.

Paul Fraley
Radiation Safety Officer
NVI, LLC

RECEIVED

FEB - 1 2012

DNMS

11 576859

Operating and Emergency Procedures

Section VIII

Lay Barge Procedures

8.0 PURPOSE AND SCOPE

The following procedures are specific for performing radiography on pipeline lay barges. These procedures are to be used in conjunction with all of NVI, LLC's Operating and Emergency Procedures.

8.1 TRANSPORTATION

8.1.1. When transporting the exposure device offshore by boat or helicopter, it shall be the radiographer's responsibility to secure the device for transport. At no time shall the radiographer surrender the exposure device to unauthorized personnel for transport offshore without maintaining direct visual supervision and surveillance.

8.1.1.1 When transporting radioactive material by helicopter, a transport Bill of Lading for Cargo Aircraft shall be submitted to the helicopter transportation provider.

8.2. SECURITY

8.2.1. At no time shall an exposure device be left where it cannot be physically and visually monitored unless all of the increased control procedures have been implemented. These procedures include two tangible locked barriers and a security alarm system.

8.2.2. When performing radiography on lay barges, it may be advantageous for the assistant radiographer to monitor the exposure device while the radiographer develops the radiographs. If not, then the exposure device must be secured and increased controls implemented.

8.2.2.1. Prior to securing the exposure device, surveys shall be performed in accordance with Section 3.8.

8.3. VISUAL SURVEILLANCE

8.3.1. Due to the size limitations, the configuration, and the number of personnel working during lay barge pipeline operations, it is imperative that the

radiographers maintain direct visual surveillance of the restrictive areas during all exposures.

- 8.3.2. When performing radiography on a lay barge, a survey shall be made of all areas that can be accessed, including below deck areas, by unmonitored persons that may result in an exposure more than 2mr/hr or 100mr/year and these areas shall be posted accordingly. It is imperative to notify personnel on the lay barge not to enter any restricted area unless cleared to do so by the radiographer.

8.4. PERSONNEL

- 8.4.1. All radiography will be performed at minimum by a two man crew. (agency carded radiography supervising trainee/assistant; agency carded instructor/trainer supervising trainee/ assistant, or two agency carded radiographers.) At no time can radiography be performed by one radiographer. In the case of a two man crew, radiography shall not be performed if one radiographer is in the darkroom. All trainee/assistants shall be under the direct visual supervision of the radiographer.

8.5. POSTING AND RESTRICTING RADIOGRAPHIC AREAS

- 8.5.1. Section 3.7 provides procedures and guidance for posting and restricting all radiographic areas.
- 8.5.2. Due to the close proximity of work areas and the possible limitations of distance and shielding on a lay barge, the following recommendations shall be considered when posting boundaries.

8.5.2.1. Collimator

When performing radiography, position the collimator so that the port (the side where you see the source tip) is facing away from the nearest unmonitored personnel. If distance limitations prevent you from achieving the required boundaries from welding stations, coating stations, etc., request an 8 HVL or if needed a 15 HVL collimator.

8.5.2.2. Shielding

Radiography should be performed in a stall (work area) that is properly shielded for lay barge pipeline lay operations. If distance limitations prevent you from achieving the required boundaries from unmonitored personnel, request additional shielding from lay barge personnel.

8.5.2.3. Source Strength

When performing lay barge radiography, select the lowest curies source practical for the scope of work.

8.5.2.4. Film Speed

When performing lay barge radiography, select the fastest film speed allowed by the applicable code, for the scope of work.

8.5.2.5. Dose

The number one priority of the radiographer performing radiography on a lay barge is to ensure that no unmonitored personnel receive any radiation dose in excess of regulatory limits.

8.6. MINIMIZING POTENTIAL RADIATION HAZARDS

- 8.6.1. Due to size limitations of a lay barge, the number of personnel present during pipe laying operations and time required to mobilize to an offshore location, extreme precautions must be utilized to minimize potential source disconnects.

8.6.1.1. Equipment Handling & Inspection

All exposure devices and associated equipment shall be inspected prior to performing radiography. Section 6 provides instructions and procedures for handling and inspection of radiographic equipment.

8.6.1.2. Maintenance & Inspection

All exposure devices and associated equipment shall be checked daily, prior to work shift, as required on the Daily Radiation Survey Report. This shall be recorded on the daily survey sheet.

8.6.1.3. Barge Movement

If at any time during a radiographic exposure the barge starts to move (laying pipe) and the collimator is attached to the pipe, immediately retract the source to the safe position.

8.6.1.4. Ceasing Operations

The radiographer in charge shall cease radiographic operations if at any time he deems that there are unsafe conditions pertaining to radiation dose to unmonitored personnel and or the possibility of a source disconnect.

8.7. EMERGENCY PROCEDURES

- 8.7.1. Section IV provides procedures to be followed in the event of an emergency situation while utilizing radioactive material.

*Remember: In the event of an emergency arising from a damaged or disconnected source, you shall immediately notify the RSO. Only the RSO or individuals who have been properly trained are authorized to retrieve disconnected sources. **RADIOGRAPHERS ARE NOT TO ATTEMPT TO RETRIEVE ANY RADIOACTIVE SOURCE.***

- 8.7.2. In the event that a radioactive source cannot be returned to its shielded position, the radiographer shall:

1. Stay calm
 2. Clear any unnecessary personnel
 3. Establish barricades at a 2mr/hour distance (or as close as possible)
 4. Maintain direct surveillance
 5. Notify lay barge captain and/or superintendent
 6. Notify RSO, if the radiographer has to leave the emergency area to contact the RSO, the assistant or additional radiographer must remain at the area and maintain surveillance.
 7. Follow all RSO instructions.
- The radiographer shall control any situation concerning a radioactive source that cannot be returned to its shielded position. The radiographer can receive assistance from the lay barge captain/supervisor/ safety official to help coordinate the effort to control the area, but at no time shall the radiographer let them make decision concerning radiation safety.



DATE

2/7/2012

NAME AND ADDRESS OF APPLICANT AND/OR LICENSEE

Non Destructive and Visual Inspection, LLC
ATTN: Paul Fraley
Radiation Safety Officer
901 Oak Street
Houma, LA 70363

LICENSE NUMBER

17-29410-01

MAIL CONTROL NUMBER

576859

LICENSING AND/OR TECHNICAL REVIEWER

This is to acknowledge the receipt of your:

☒ LETTER and/or ☐ APPLICATION DATED: _____

The initial processing, which included an administrative review, has been performed.

☒ AMENDMENT ☐ TERMINATION ☐ NEW LICENSE ☐ RENEWAL

- ☒ There were no administrative omissions identified during our initial review.
- ☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.
- ☐ Your application for a new NRC license did not include your taxpayer identification number. Please fill out NRC Form 531, located at the following link:

<http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>

Send the completed NRC Form 531, by facsimile, to the following number: (301) 415-5387

A copy of your action has been emailed to our License Fee and Accounts Receivable Branch, in our Headquarters office in Rockville, MD. You will be contacted separately if there is a fee issue involved.

Your application has been assigned the above listed **MAIL CONTROL NUMBER**. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region IV
U. S. Nuclear Regulatory Commission
DNMS/NMSB - B
1600 E. Lamar Boulevard
Arlington, TX 76011-4511
(817) 200-1103 or (817) 200-1140

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM LTS

Program Code: 03320
Status Code: Pending Amendment
Fee Category: 2B 30
Exp. Date: 11/30/2020
Fee Comments:
Decom Fin Assur Req: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: NONDESTRUCTIVE AND VISUAL INSPECTION, LLC
Received Date: 02/01/2012
Docket Number: 3038376
Mail Control Number: 576859
License Number: 17-29410-01
Action Type: Amendment

2. FEE ATTACHED

Amount: _____

Check No.: _____

3. COMMENTS

Signed: _____

Date: _____

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

Signed: _____

Date: _____