

**Titan Wireline Services Inc.**  
P.O. Box 286  
Elderton, PA. 15736

**United States Nuclear Regulatory Commission**  
Attn: Document Control Desk  
Washington, D.C. 20555

**April 15, 2007**

Re: "Reply to a Notice of Violation" resulting from Inspection # 03021037/2007001

Dear Sir/ Madam,

This letter is in response to Titan Wireline Services, Inc.'s (TWSI) receipt of the above referenced Inspection Report, issued by the United States Nuclear Regulatory Commission (USNRC). A *Notice of Violation (NOV)* was issued based upon the results of apparent regulatory non-compliance, as identified during inspections conducted February 8 and March 14, 2007 at the Elderton, PA facility.

Titan Wireline Services, Inc. management representatives, as well as a private health physics consulting company, have reviewed each item of potential non-compliance and provided the following documented response:

- A. 49 CFR 172.202(a) and (b) require in part, with exceptions not applicable here, that the shipping description of a hazardous material on the shipping paper include, in the following sequence: (1) the proper shipping name prescribed for the material in 172.101; (2) the hazard class prescribed for the material as shown in Column 3 of the 172.101 Table; and (3) the identification number prescribed for the material as shown in Column 4 of the 172.101 Table. Pursuant to 49 CFR 172.101, radioactive material is classified as hazardous material.

Contrary to the above, on March 8, 2007, the licensee transported licensed material outside the confines of the Elderton facility using shipping papers with an outdated proper shipping name and identification number. Specifically, the licensee used shipping papers describing hazardous material listed as UN2974 rather than the correct identification number of UN3332.

This is a Severity Level IV violation (Supplement V)

Titan Wireline Services, Inc. Response

TWSI has revised shipping papers to meet the proper shipping name and identification number as described. The shipping paper shall be completed and made available for inspection during each shipment of applicable radioactive sources. TWSI management shall ensure compliance with this issue during initial and periodic training sessions.

IE07

- B. 10 CFR 20.1101© requires that the licensee periodically review, at least annually, the radiation protection program content and implementation.

Contrary to the above, the licensee did not conduct at least annual reviews of the radiation protection program content and implementation. Specifically, the annual program review has not been conducted since the last NRC inspection on May 20, 2004.

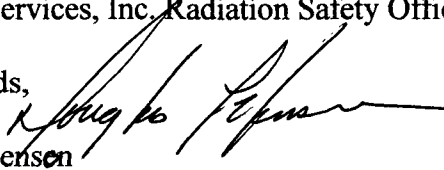
This is a Severity Level IV violation (Supplement IV)

Titan Wireline Services, Inc. Response

TWSI contracted with Applied Health Physics, Inc., a radiological consulting firm, to conduct an audit of the radiation safety program, as required. The initial program review was completed on March 22, 2007. TWSI management shall ensure future compliance with this issue through contracted or internal program reviews.

TWSI intends to comply with all regulatory requirements to gain and maintain compliance. Any questions regarding this correspondence should be forwarded to Titan Wireline Services, Inc. Radiation Safety Officer David Leshar at 724-354-2629.

Best regards,

  
Douglas Hensen  
Titan Wireline Services, Inc.  
President