



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

April 24, 2014

EA-14-062

Mr. John Lockwood, President
Acuren USA
43 Arch Street
Greenwich, CT 06830

SUBJECT: CONFIRMATORY ACTION LETTER – ACUREN USA

Dear Mr. Lockwood:

On April 10, 2014, while performing an unannounced inspection of your field station in Kenai, Alaska, the U.S. Nuclear Regulatory Commission (NRC) inspectors walking around the outside of your building observed their survey meter read off-scale in an area where there were no boundaries or physical controls to prevent entry into the area by members of the public. At the time, an Acuren USA crew had begun a radiographic exposure inside the building. As the inspectors retreated from the area, they noted that at a distance of about 40 feet from the building their survey meter displayed a reading of about 200 mR/hour during the 2-minute exposure. Licensee personnel subsequently informed the inspectors that they had taken a total of six 2-minute exposures in approximately a 1-hour timeframe. The inspectors determined that Acuren USA did not normally conduct radiographic operations at that location and work for the week had been completed. The inspectors performed an initial dose assessment and determined that a member of the public standing next to the building could have received a dose in excess of the annual limits in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20.1301(a)(1) during the time required to complete the six exposures. In addition, the inspectors were concerned that individuals working in a nearby office could have received a dose in excess of regulatory limits over the course of a year.

On April 14, 2014, an NRC inspector, Mr. Don Stearns, Health Physicist, continued his discussions of the findings with Mr. Travis Thorson, Division Manager. Mr. Thorson stated that Acuren USA had ceased radiographic operations at its Kenai, Alaska, field location and would not resume operations until it determines the cause of the incident and any unintended consequences. Later on April 14, 2014, a telephone conversation was conducted with the following Acuren USA personnel: Chris Dixon, Radiation Safety Officer; Dennis Lee, General Manager; Frank Noble, Director of Operations; and Travis Thorson, Division Manager; and the following NRC personnel: Tony Vogel, Director, Division of Nuclear Materials Safety; Michael Vasquez, Chief, Nuclear Materials Safety Branch A; Latischa Hanson, Health Physicist; and Jason Dykert, Health Physicist. Based on that telephone conversation, it is our understanding that prior to resuming radiographic exposures at the Kenai, Alaska field station located at 14896 Kenai Spur Highway #112, Kenai, Alaska, Acuren USA will perform the following actions that will be completed by May 14, 2014:

1. Acuren USA will provide the NRC in writing a description of actions it has taken or will take to ensure that future NRC-licensed activities at the Kenai field station will not result in any member of the public receiving a dose in excess of the limits listed in 10 CFR 20.1301.
2. Acuren USA will provide, in writing, the calculations and evaluations necessary to determine whether members of the public received doses in excess of NRC limits at its Kenai station due to past licensed activities. This dose evaluation will meet the requirements of 10 CFR 20.1302.
3. Acuren USA will perform an equivalent evaluation of its field station in Anchorage, Alaska, and its temporary jobsites to determine whether members of the public have received doses in excess of the annual limits in 10 CFR 20.1301. If Acuren USA identifies similar infractions, Acuren USA commits to immediately cease radiographic operations at those sites until NRC verifies that Acuren USA has effectively implemented corrective actions demonstrating that members of the public will not receive doses in excess of the annual limits. Acuren USA will immediately inform NRC Region IV, of any such cessation of radiographic operations. Further, Acuren USA will provide, in writing, a copy of the evaluations of its other field office and temporary jobsites.
4. The documents that Acuren USA will provide the NRC, as stated above, will be sent to the Director, Division of Nuclear Materials Safety, U.S. Nuclear Regulatory Commission, Region IV, 1600 E. Lamar Blvd., Arlington, TX 76011.
5. Acuren USA commits to not conduct radiographic exposures at the Kenai, Alaska, field station until the NRC has completed its review of the evaluations listed above and has verified in writing that Acuren USA has effectively implemented the above commitments.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

1. Notify me immediately if your understanding differs from that set forth above;
2. Notify me if for any reason you cannot complete the actions within the specified schedule and advise me, in writing, of your modified schedule in advance of the change;
3. Notify me if for any reason you intend to change, deviate from, or not complete any of the documented commitments, and advise me, in writing, of your changes or deviations.
4. Notify me, in writing, when you have completed the actions addressed in this Confirmatory Action Letter.

This Confirmatory Action Letter does not modify or amend Acuren USA's license. Issuance of this letter does not preclude issuance of an Order formalizing the above commitments or requiring other actions on the part of the licensee. In addition, the failure to meet the commitments of this letter may result in an Order, if the licensee's performance in meeting these commitments does not provide reasonable assurance that the NRC can rely on the licensee to meet the NRC's requirements and protect public health and safety or the common defense and security. Nor does it preclude the NRC from taking enforcement action for violations of NRC

requirements associated with the activities that prompted the issuance of this Confirmatory Action Letter.

In accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice and Procedure," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

To the extent possible, your response should not include any personal privacy, proprietary, security-related or safeguards information, so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

If you have any questions concerning this matter please contact Mr. Michael Vasquez, Chief, Nuclear Materials Safety, Branch A at 817-200-1130.

Sincerely,

/RA Steven A. Reynolds Acting for/

Marc L. Dapas
Regional Administrator

Docket No. 030-38596
License No. 50-32443-01

cc:

Mr. Dennis Lee, General Manager
Acuren USA
600 E. 57th Place, Suite B
Anchorage, AK 99518

Mr. Clyde E. Pearce, Chief
Radiological Health Program
Section of Laboratories
State of Alaska/DH&SS
5455 Dr. Martin Luther King, Jr., Ave.
Anchorage, AK 99507-1270

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cc:
Mr. Dennis Lee, General Manager
Acuren USA
600 E. 57th Place, Suite B
Anchorage, AK 99518

Mr. Clyde E. Pearce, Chief
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Letter to Mr. John Lockwood from Marc L. Dapas, dated April 24, 2014.

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