

July 02, 2014

L1
37-23410-01
03021037
2014001

REC-61 0709:14 PM 07/07

Via e-mail and Certified Mail, Return Receipt Requested, No. 7014 0150 0002 0442 2833

United States Nuclear Regulatory Commission Region I
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

RE: Reply to a Notice of Violation
NRC Inspection Report No. 03021037/20114001
AWS, Inc. DBA Titan Wireline

Dear Mr. Welling:

This correspondence is in response to the Nuclear Regulatory Commission's (NRC) letter dated June 16, 2014 and received by us on July 02, 2014 regarding alleged violations identified during your site inspection March 18, 2014. With respect to concerns identified in the report captioned above Titan Wireline Services ("Titan Wireline") will put into practice the following corrective actions.

Responses to Alleged Violations Cited:

- A. 10 CFR 39.61(c) requires that the licensee shall provide safety reviews for logging supervisors and logging assistants at least once during each calendar year.

Corrective Action: Safety reviews for all logging supervisors and assistants will be conducted according to 10 CFR 39.61(c) at least once during each calendar year. The 2014 safety review has been accomplished for all logging supervisors and assistants. Copies of the safety training class rosters are enclosed as an attachment.

An electronic compliance matrix has been created to track and ensure all future safety reviews are conducted according to our NRC license requirement. A copy of the referenced matrix is enclosed as an attachment.

The target date for completion of this activity is July 31, 2014.

NMSS/RGNI MATERIALS-004

- B. 10 CFR 30.34(c) requires, in part, that each person licensed by the commission pursuant to the regulations in Part 30 shall confine his possession and use of the byproduct material to the locations and purposes authorized in the license.

NRC License No. 37-23410-01, Condition No. 18 states, in part, that the licensee will conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures listed below, including the license application dated March 31, 2004. Section 10.5.A of the license application states that "Annual unannounced inspections of all logging supervisors will be conducted by the RSO and or ARSO to determine compliance with regulations and written operating and safety procedures."

Corrective Action: Annual unannounced compliance inspection of all authorized users will be conducted by the Company's RSO or ARSO. The purpose of the assessment is to identify any gaps in our radiation protection program and implement the necessary corrective actions to upgrade our procedures to ensure compliance with applicable radiation control standards contained in 10 CFR 30.34(c) and our NRC license Section 10.5A. A copy of the most recent compliance inspection is enclosed as an attachment.

An electronic compliance matrix has been created to track and ensure that annual compliance inspections are conducted in the future according to our NRC license requirements. A copy of the referenced matrix is enclosed as an attachment.

The target date for completion of this activity is July 31, 2014 or next scheduled job.

- C. 10 CFR 39.61(d) states, in part, that the licensee shall maintain a record on each logging supervisors and logging assistants training and annual safety review. The training records must include copies of written tests and dates of oral tests given after July 14, 1987. The training records must be retained until three years following the termination of employment. Records of annual safety reviews must list the topics discussed and be retained for three years.

Corrective Action: Records of each logging supervisors and logging assistants training, annual safety review, and tests referenced in our response in item A are on file and will be maintained according to 10 CFR 39.61(d).

An electronic compliance matrix has been created to track and ensure document that all logging supervisors and assistant logging supervisors future safety reviews are tracked and conducted according to our NRC license requirements. A copy of the referenced matrix is enclosed as an attachment.

The target date for completion of this activity is July 9, 2014.

The individuals responsible for overall management of the business activities will receive awareness training that will cover radiation safety and the company's duties and responsibilities under our NRC license No. 37-23410-01 no later than July 15, 2014. Such training will be conducted by the RSO or ARSO for Warrior Energy Services Corporation License # 17-17707-

01 (parent company of Titan Wireline). The RSO and other individuals responsible for managing our radiation safety program according to the terms and conditions of our NRC license have received appropriate training. Copies of the radiological training certificates are provided as an attachment. A complete list of the employees who have or will receive the training according to these conditions is provided below.

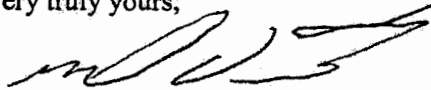
| Employee Name | Title | Training | Date | Training Provider |
|--------------------|-----------------------|--------------------|------|------------------------|
| Vance Byram | RSO | RSO Refresher | | Applied Health Physics |
| Todd Riggle, | Operations Supervisor | RSO | | Applied Health Physics |
| Robert Weiss | Operations Supervisor | Awareness Training | | Warrior SRSO |
| Mark Boyer | Technician | RSO | | Applied Health Physics |
| Rick McKee | Safety Coordinator | RSO Refresher | | Applied Health Physics |
| Michael Daquilante | Regional Manager | Awareness Training | | Warrior RSO |
| Timothy Rearick | Operations Manager | Awareness Training | | Warrior RSO |

Future plans as they exist today are to allow the U.S. Nuclear Regulatory Commission's License #37-23410-01 to expire on July 31, 2014. The material under the jurisdiction of this license will be supported and transferred to the U.S. Nuclear Regulatory Commission's License #17-17707-01. The current Radiation Safety Officer (RSO) listed on License #37-23410-01, Vance Byram, will not assume the duties of RSO under the License #17-17707-01.

It is the intention of Titan Wireline Services to demonstrate through our actions that the issues described in the Notice of Violation have been treated with the appropriate level of sincerity and thoroughness as to avoid reoccurrence of similar events in the future. Titan Wireline is committed to regulatory compliance at our facility. If you require any additional or supporting information with respect to any of the issues described in this letter, please do not hesitate to contact the undersigned.

Thank you for your consideration regarding this matter.

Very truly yours,



Michael Daquilante
Regional Manager
Titan Wireline
PO Box 286
Elderton, PA 15736

AWS / Titan Wireline Radiation History Review Matrix

| Employee Name | | Active | Title | 2014 Annual Review | | | | RSO Training | RSO Refresher |
|---------------|------------|--------|--------------------|--------------------|----------------|-------------------|--------------------------------|--------------|---------------|
| | | | | 2014 User List | 2014 Job Usage | 2014 Annual Audit | 2014 Radiation Safety Training | | |
| Mark | Boyer | | Technician | | | | | | |
| Vance | Byram | | RSO | | | | | | |
| Michael | Daquilante | | Regional Mgr | | | | | | |
| Norman Rick | McKee | | Safety Coordinator | | | | | | |
| Timothy | Rearick | | Ops. Mgr. | | | | | | |
| Todd | Riggle | | Ops. Supv. | | | | | | |
| Robert | Weiss | | Ops. Supv. | | | | | | |

Legend



**CLASS ROSTER - SAFETY REVIEWS
LOGGING SUPERVISORS AND ASSISTANTS**

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STANDARD CORPORATE FORM

SCF-003

TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety

Date: 6/5/14

Instructor Name & Company: Rick McKee WESC

Location: 1300-200

| | Employee Name | Employee # or Last 4 of SSN | Division or Sub-Name | Employee Signature | Completed |
|----|---------------------|--------------------------------|-------------------------|--------------------|-----------|
| 1 | Josh Barden | [REDACTED] | 1300-200 | Josh Barden | 6/5/14 |
| 2 | Christopher Hartman | [REDACTED] | 1300-200 | Chris Hartman | |
| 3 | Mark Elgin | [REDACTED] | 1300-200 | Mark Elgin | |
| 4 | Randy Redding | [REDACTED] | 1300-200 | Randy Redding | |
| 5 | Robert Lyle | [REDACTED] | 1300-200 | Robert Lyle | |
| 6 | Dale Hough | [REDACTED] | 1300-200 | Dale Hough | |
| 7 | Angela Swartz | [REDACTED] | 1300-200 | Angela Swartz | 6/5/14 |
| 8 | | | | | |
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| 20 | | | | | |

COURSE START TIME: 2:15pm COURSE FINISH TIME: 2:45pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee
Instructor Signature

6/5/14
Date

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STANDARD CORPORATE FORM

SCF-003

TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety Date: 6/5/14
Instructor Name & Company: Rick McKee WESC Location: 1300-200

| | Employee Name | Employee # or Last 4 of SSN | Division or Sub. Name | Employee Signature | Completed |
|----|------------------|--------------------------------|--------------------------|--------------------|-----------|
| 1 | Barry McIlwain | [REDACTED] | 1300-200 | [Signature] | 6/5/14 |
| 2 | Lane Fitzgerald | [REDACTED] | 1300-200 | [Signature] | |
| 3 | David C. Brierer | [REDACTED] | 1300-200 | [Signature] | |
| 4 | Josh Clark | [REDACTED] | 1300-200 | [Signature] | |
| 5 | Dan Handley | [REDACTED] | 1300-200 | [Signature] | |
| 6 | IVSON MISH | [REDACTED] | 1300-200 | [Signature] | |
| 7 | JAMES MERRIMAN | [REDACTED] | 1300-200 | [Signature] | |
| 8 | Serry Lichtensin | [REDACTED] | 1300-200 | [Signature] | 6/5/14 |
| 9 | | | | | |
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| 20 | | | | | |

COURSE START TIME: 1:30pm COURSE FINISH TIME: 2:00pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee
Instructor Signature

6/5/14
Date

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STANDARD CORPORATE FORM

SCF-003

TRAINING RECORD

PLEASE PRINT CLEARLY

Course Title: Radiation Safety

Date: 6/5/14

Instructor Name & Company: Rick McKee WESC

Location: 1300-200

| | Employee Name | Employee ID Tag # or SSN | Division or Sub Name | Employee Signature | Completed |
|----|----------------------|-----------------------------|-------------------------|--------------------|-----------|
| 1 | Josh Barden | [REDACTED] | 1300-200 | John Barden | 6/5/14 |
| 2 | Christopher Harkness | [REDACTED] | 1300-200 | Chris Harkness | |
| 3 | Mark Elgin | [REDACTED] | 1300-200 | Mark Elgin | |
| 4 | Randy Riddinger | [REDACTED] | 1300-200 | Randy Riddinger | |
| 5 | Robert Wells | [REDACTED] | 1300-200 | Robert Wells | |
| 6 | Dale Hargy | [REDACTED] | 1300-200 | Dale Hargy | |
| 7 | Angela Swartz | [REDACTED] | 1300-200 | Angela Swartz | 6/5/14 |
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| 20 | | | | | |

COURSE START TIME: 2:15 pm COURSE FINISH TIME: 2:45 pm COURSE DURATION: 1/2 hr

Upon completion of training, instructor must verify by signature that all students appearing on this roster have completed the training requirements for this date. Incomplete rosters will not be accepted and will be returned to sender.

Rick McKee
Instructor Signature

6/5/14
Date

COMPLIANCE MATRIX

AWS Titan Compliance Matrix


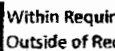
| Employee Name | | Active | Title | 2014 | | | | | | 2015 | | | | | |
|---------------|-----------------|--------|--------------------|----------------|----------------|-------------------|--------------------------------|--------------|---------------|----------------|----------------|-------------------|--------------------------------|--------------|---------------|
| | | | | 2014 User List | 2014 Job Usage | 2014 Annual Audit | 2014 Radiation Safety Training | RSO Training | RSO Refresher | 2015 User List | 2015 Job Usage | 2015 Annual Audit | 2015 Radiation Safety Training | RSO Training | RSO Refresher |
| First Name | Last Name | | | | | | | | | | | | | | |
| Cory | Adams | | | | | | | | | | | | | | |
| Ryan | Arbaugh | | Ops. Supv. | | | | | | | | | | | | |
| Jeffery | Armstrong | | Operator | | | | | | | | | | | | |
| Joshua | Barden | | Skill Labor | | | | | | | | | | | | |
| David | Bierer | | Skill Labor | | | | | | | | | | | | |
| Joseph | Boyle | | | | | | | | | | | | | | |
| Mark | Boyer | | Technician | | | | | | | | | | | | |
| Vance | Byram | | RSO | | | | | | | | | | | | |
| Nicholas | Carney | | | | | | | | | | | | | | |
| Joshua | Clark | | Operator | | | | | | | | | | | | |
| Russell | Clark, Jr. | | Operator | | | | | | | | | | | | |
| Richard | Cramer | | | | | | | | | | | | | | |
| Michael | Daquilante | | Regional Mgr | | | | | | | | | | | | |
| Mark | Elgin | | Shop Foreman | | | | | | | | | | | | |
| Keith | Fleming | | | | | | | | | | | | | | |
| Richard | Fitzgerald, Jr. | | Ops. Supv. | | | | | | | | | | | | |
| Lane | Fitzgerald | | Operator | | | | | | | | | | | | |
| William | Gett | | | | | | | | | | | | | | |
| Richard D | Haag | | Skill Labor | | | | | | | | | | | | |
| Christopher | Harkleroad | | Shop Labor | | | | | | | | | | | | |
| Justin | Hartzell | | Operator | | | | | | | | | | | | |
| Daniel | Headley | | Operator | | | | | | | | | | | | |
| Brian | Huffman | | Ops. Supv. | | | | | | | | | | | | |
| Christopher | Klonowski | | | | | | | | | | | | | | |
| John | King | | Operator | | | | | | | | | | | | |
| Jerry | Lichtenfels | | Skill Labor | | | | | | | | | | | | |
| Shawn | Lockard | | Ops. Supv. | | | | | | | | | | | | |
| Randy | Lukehart | | | | | | | | | | | | | | |
| Matthew | McCormick | | Operator | | | | | | | | | | | | |
| Barry | McIlwain | | Skill Labor | | | | | | | | | | | | |
| Lanny | McLain | | | | | | | | | | | | | | |
| Norman Rick | McKee | | Safety Coordinator | | | | | | | | | | | | |
| James | Merryman | | Skill Labor | | | | | | | | | | | | |
| Cody | Meyer | | Operator | | | | | | | | | | | | |
| William | Metro | | | | | | | | | | | | | | |
| Tyson | Mish | | Operator | | | | | | | | | | | | |
| Timothy | Monoskey | | Ops. Supv. | | | | | | | | | | | | |
| Jeffrey | Nickle | | | | | | | | | | | | | | |
| W. | Orr | | | | | | | | | | | | | | |
| Joseph | Plaskunak | | | | | | | | | | | | | | |
| J | Pough | | | | | | | | | | | | | | |

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AWS Titan Compliance Matrix

| Employee Name | | Active | Title | 2014 | | | | | | 2015 | | | | | |
|---------------|-------------|--------|----------------|----------------|----------------|-------------------|--------------------------------|--------------|---------------|----------------|----------------|-------------------|--------------------------------|--------------|---------------|
| | | | | 2014 User List | 2014 Job Usage | 2014 Annual Audit | 2014 Radiation Safety Training | RSO Training | RSO Refresher | 2015 User List | 2015 Job Usage | 2015 Annual Audit | 2015 Radiation Safety Training | RSO Training | RSO Refresher |
| Timothy | Rearick | | Ops. Mgr. | | | | | | | | | | | | |
| Randall | Reddinger | | Skill Labor | | | | | | | | | | | | |
| Aaron | Renwick | | Ops. Supv. | | | | | | | | | | | | |
| Stanley | Riggle | | | | | | | | | | | | | | |
| Todd | Riggle | | Ops. Supv. | | | | | | | | | | | | |
| Brandon | Rosenberger | | | | | | | | | | | | | | |
| Larry | Ross | | | | | | | | | | | | | | |
| Kevin | Rupert | | Ops. Supv. | | | | | | | | | | | | |
| Rod | Seita | | Operator | | | | | | | | | | | | |
| Evan | Sharrer | | Operator | | | | | | | | | | | | |
| Joshua | Simmons | | Operator | | | | | | | | | | | | |
| Terry | Streightif | | | | | | | | | | | | | | |
| Angela | Swartz | | Administrative | | | | | | | | | | | | |
| Larry | Swartz | | | | | | | | | | | | | | |
| Aaron | Thomas | | Ops. Supv. | | | | | | | | | | | | |
| Steven | Townsend | | Ops. Supv. | | | | | | | | | | | | |
| Robert | Weiss | | Ops. Supv. | | | | | | | | | | | | |
| Randall | Williams | | Operator | | | | | | | | | | | | |
| James | Woodside | | Operator | | | | | | | | | | | | |
| Jared | Woodside | | Operator | | | | | | | | | | | | |

Legend

 Within Requirements
 Outside of Requirements

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COMPLIANCE INSPECTION



AWS Inc.

**ANNUAL RADIATION SAFETY AUDIT
May 2014**

LICENSE REVIEW:

U.S. Nuclear Regulatory Commission License No. 37-23410-01
Amendment No. 11 - February 9, 2009
Expiration Date: July 31, 2014

PA Department of Environmental Protection License No. PA-1032
Amendment No. 2 - February 9, 2009
Expiration Date: July 31, 2014

PA Department of Environmental Protection Certification No. PA-G0119
Amendment New - May 27, 2009
Renewal Date: June 30, 2010 - Discontinued

NY Department of Health License No. C3250
Amendment No.3 - May 1, 2011
Expiration Date: November 30, 2013 - Will Discontinue

Ohio Department of Health Bureau of Radiation Protection
2010 RECIPROCITY AUTHORIZATION 00004 PA 1011
January 1 through December 31, 2010 - Discontinued

PREVIOUS AUDITS:

All items were completed

INSPECTIONS:

U.S. Nuclear Regulatory Commission - November 28, 2007
No violations identified - previous violation(s) closed.

NY Department of Health - January, 2008
No items of noncompliance were found.

PA DEP Bureau of Radiation - June, 2009
No items of noncompliance were found.

OHIO Department of Health Bureau of Radiation Protection- March 2010
No Items of noncompliance were found.

Pa DEP Bureau of Radiation – September 21, 2011 by Celia Rajkovich
Recommendations:
Ensure that gauges are mounted and posted in a manner that ensures ALARA
Ensure that gauges are properly labeled and marked for transportation
Recommendations were followed and a binder was made up for each Vehicle which include shipping papers, leak tests, NRC & PA DEP licenses

U.S. Nuclear Regulatory Commission- January, 2011
No items of noncompliance were found.

PA DEP Bureau of Radiation – May 2012 by Celia Rajkovich
Labels to be laminated and attached to densometers on trucks.
Shutters are closed and locked in storage during transporting.

U.S. Nuclear Regulatory Commission- March, 2014 by Scott Wilson
The following items of noncompliance were found:

- 1: Failure to maintain logging supervisor and assistant training records
- 2: Failure to provide safety reviews annually for logging supervisors and assistants
- 3: Failure to conduct annual unannounced inspections of all logging supervisors

LICENSED MATERIAL SECURITY:

Quantities of Concern requirements completed.

OPERATING PROCEDURES:

Current and in-place.

EMERGENCY PROCEDURES:

Current and in-place.

RADIATION GENERATING DEVICES:

None possessed.

INVENTORY OF SPECIFICALLY LICENSED MATERIALS:

See attached physical inventory.

GENERALLY LICENSED DEVICES:

See attached list of devices.

RADIATION SURVEYS OF RESTRICTED AREAS:

Surveys completed for transport vehicles and logging tools.

RADIATION SURVEY METERS:

See attached calibration documentation.

LEAK TESTING:

Leak testing completed every six months.
See attached leak test documentation.

PERSONNEL MONITORING PROGRAM:

Quarterly exposure records are reviewed by badged workers with any exposure during the quarter. Records are signed and placed in the files.

Annual exposure records are not currently provided for badged workers. A request for individual reports has been sent to RADETCO.

The badged worker group is reviewed on a quarterly basis to identify those personnel that are assigned duties that include working with radioactive sources.

ANNUAL REVIEW OF AUTHORIZED USERS:

Last reviews dated 2013.

DISPOSAL OF RADIOACTIVE MATERIALS:

No disposal of licensed material has taken place since last annual review.

SHIPPING OF RADIOACTIVE MATERIALS:

Shipping papers revised to comply with U.S. Department of Transportation requirements.

FACILITY INSPECTION OF RADIOGRAPHY AREAS:

Required signs and postings noted. Security in place for radioactive materials.

FINDINGS:

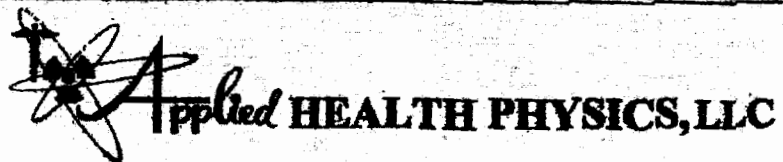
The review of the Titan Wireline Services Radiation Safety Program was conducted by Vance Byram, RSO, on May 2, 2014. The overall assessment of Radiation Safety at Appalachian Well Services is satisfactory.

The findings and recommendations as identified by this review will be addressed in a timely manner.

Corrective Actions:

- 14 - 01: Have logging supervisors and assistants attend RSO training, Two of the supervisors and assistants have taken the RSO on May 15, 2014 with the others to be enrolled in the fall class. Radiation Safety training to all other employees to be conducted on an annual basis; in process.**
- 14- 02: Conduct unannounced inspections of logging supervisors on job locations; In process**
- 14 - 03: Conduct annual training on timely basis by using an electronic calendar reminder and a training matrix.**

RADIOLOGICAL TRAINING CERTIFICATES



CERTIFICATE OF RADIOLOGICAL TRAINING

This is to certify that

Mark Boyer

has successfully completed

**24 HOUR RADIATION SAFETY OFFICER TRAINING COURSE
AND INSTRUCTION AS REQUIRED BY NUREG-1556
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, LLC
May 13th through May 15th, 2014*


Todd Y. Mobley, Director, Technical Services


Management Review


Date


DOT Subpart H Expiration Date

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Applied HEALTH PHYSICS, LLC

CERTIFICATE OF RADIOLOGICAL TRAINING

This is to certify that

Vance Byram

has successfully completed the

**8-HOUR RADIATION SAFETY OFFICER REFRESHER TRAINING
AND INSTRUCTION AS REQUIRED BY NUREG-1556
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, Inc.
May 20th, 2014*

Todd Y. Mobley – Director, Technical Services

Management Review

Date

DOT Subpart H Expiration Date

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Applied HEALTH PHYSICS, LLC

CERTIFICATE OF RADIOLOGICAL TRAINING

This is to certify that

Todd Riggle

has successfully completed

**24 HOUR RADIATION SAFETY OFFICER TRAINING COURSE
AND INSTRUCTION AS REQUIRED BY NUREG-1556
VOLUME 14 AND 49 CFR 172, SUBPART H**

*presented by Applied Health Physics, LLC
May 13th through May 15th, 2014*



Todd Y. Mobley, Director, Technical Services



Management Review

Date

DOT Subpart H Expiration Date

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