

INSPECTION RECORD

Region: III

Inspection Report No. 2017-002

License No. 42-32507-01

Docket No. 030-36565

Licensee: Petrochem Inspection Services, Inc.
d/b/a TÜV SÜD America, Chemical Oil & Gas
1475 East Sam Houston Parkway South, Suite 100
Pasadena, Texas 77503

Locations Inspected: 2637 Belknap Avenue, Billings, Montana 59101
401 S. 23rd Street, Billings, Montana 59101

Licensee Contact: Matthias S. Kraneiss, Corporate RSO

Telephone No. 281-884-5142

Program Code: 03320

Priority: 1

Type of Inspection: ☐ Initial ☒ Routine ☐ Announced
☐ Special ☒ Assist ☒ Unannounced

Last Inspection Date: 06/27/17

Date of This Inspection: 04/25/17, with in-office
review through 09/06/17

Next Inspection Date: 06/27/18

☒ Normal ☐ Reduced

Summary of Findings and Actions:

- ☐ No violations cited, clear U.S. Nuclear Regulatory Commission (NRC) Form 591 or regional letter issued
- ☐ Non-cited violations (NCVs)
- ☐ Violation(s), Form 591 issued
- ☒ **Violation, regional letter issued**
- ☐ Follow-up on previous violations

Inspector: Jason C. Dykert, Health Physicist

/RA by Ryan Craffey for/

Signature

Date 10/17/2017

Approved: Aaron T. McCraw, Chief, MIB

/RA/

Signature

Date: 10/19/2017

PART I – LICENSE, INSPECTION, INCIDENT/EVENT AND ENFORCEMENT HISTORY

1. AMENDMENTS AND PROGRAM CHANGES SINCE LAST INSPECTION:

<u>AMENDMENT #</u>	<u>DATE</u>	<u>SUBJECT</u>
14	09/14/2017	The Erie, Michigan location was removed from the license.
13	02/17/2017	The second Billings, Montana location was authorized on the license.
12	06/10/2016	The first Billings, Montana, location was authorized on the license and "d/b/a TÜV SÜD America, Chemical Oil & Gas" was added to the licensee name.

2. INSPECTION AND ENFORCEMENT HISTORY:

The last inspection of this licensee occurred after this inspection was performed, on June 27, 2017, at the Erie, Michigan, field office. No violations of NRC requirements were identified.

Previous to this inspection, on July 11, 2016, the NRC identified one unresolved item regarding the licensee's use of Instadose devices to satisfy regulatory requirements in 10 CFR 34.47(a)(3) for personnel monitoring during radiographic operations. The use of Instadose devices is still an unresolved item, which remains under NRC review.

3. INCIDENT/EVENT HISTORY:

No incidents or events since the previous inspection.

PART II – INSPECTION DOCUMENTATION

1. ORGANIZATION AND SCOPE OF PROGRAM:

Petrochem Inspection Services, Inc. d/b/a TÜV SÜD America, Chemical Oil & Gas, was authorized by NRC Materials License No. 42-32507-01 to use byproduct material in NRC jurisdiction for industrial radiography. The licensee's Corporate Radiation Safety Officer (RSO) and other corporate staff were based in Pasadena, Texas. At the time of the inspection, the licensee also maintained three field offices in NRC jurisdiction; one in Erie, Michigan, and two in Billings, Montana. The Erie office has since been removed from the license.

At the time of the inspection, eight radiographers and one radiographer's assistant worked out of the Billings, Montana field office.

2. SCOPE OF INSPECTION:

Inspection Procedure(s) Used: 87121

Focus Areas Evaluated: All

The inspector toured the licensee's field office in Billings, Montana, to evaluate the licensee's measures for material security, hazard communications and exposure control. The inspector visited the licensee's other field office in Billings at the Phillips 66 Refinery to assess the licensee's transportation practices and to observe the use of licensed material in the field.

Through interviews with the site RSO, radiographers, and radiographer's assistant, the inspector found that the licensee's staff was knowledgeable of radiation protection principles and the operating and emergency procedures for use, storage and transportation of radiography exposure devices.

The inspector reviewed a selection of licensee records for physical inventories of licensed material, leak tests, utilization logs, routine daily survey records, calibration records, job performance field audits, dosimetry records, and annual audits. The inspector also reviewed the licensee's personnel training records and shipping papers.

3. INDEPENDENT AND CONFIRMATORY MEASUREMENTS:

Using a RadEye™ G energy-compensated Geiger-Müller survey instrument, serial number 13421, calibration date of November 4, 2016, the inspector conducted independent surveys at each of the locations inspected. The inspector measured radiation levels that indicated no residual contamination existed, that postings were adequate, and exposures to members of the public would not be in excess of regulatory limits.

4. VIOLATIONS, NCVs, AND OTHER SAFETY ISSUES:

The inspector identified one Severity Level IV violation of a security-related nature that is discussed in detail in the non-public Security Addendum to this inspection record.

5. PERSONNEL CONTACTED:

Matthias S. Kraneiss, Corporate QA/QC, Level III & Corporate RSO
Isaiah Murphy, Billings Site RSO

Attended exit meeting on September 22, 2017.

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