

08 August 2019

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No.: 030-37816
License No.: 17-29308-01
EA-19-017

Cc: Director, Division of Reactor Projects
U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd., Arlington, TX 76011-4511

Supplement to July 24th, 2019 Response to letter "NRC INSPECTION REPORT 030-37816/2019-001 AND NOTICE OF VIOLATION" July 3, 2019

Apparent Violation - 10 CFR 30.50(b)(2) and 10 CFR 30.50(c)(1) Reporting requirements

Regarding the "Preventive Corrective Steps" for the above referenced Apparent Violation we wish to include the following process changes to further enhance the ones originally proposed to better mitigate the potential of any future recurrences.

Additional Preventative Corrective Steps

In addition to the already proposed actions for revision of the "Operating & Emergency Procedure" to include all regulatory reporting requirements we shall also incorporate use of our online global reporting tool (IHSE) which will immediately notify (Via email) local & executive management on all reportable incidents along with the reporting requirements (see appendix 1 for system test notification) this will allow for better visibility and assurance or the required regulatory steps.

The proposed notification list would be the following:

Local Ops Manager
Regional Business Manager
Global Director QHSE
Group EVP



Date of full implementation

We have begun the IT process for system updates and have received initial approval for the proposed changes once completed we will revise the applicable procedures to align with the new reporting process. We anticipated the implementation for this additional supplement will be completed on or before December 1, 2019.

If any other information or clarification is needed, contact William Johnston at 985-872-3990.

Regards,
Intertek Asset Integrity Management



William Johnston
RSO



APPENDIX 1

-----Original Message-----

From: IHSE Notifications <ihse.notifications@intertek.com>
Sent: Monday, August 19, 2019 2:02 AM
To: James Goree Intertek <james.goree@intertek.com>
Cc: IHSE Notifications <ihse.notifications@intertek.com>
Subject: New Radiation Safety (Radiation Safety) incident added to Industry Services - Asset Integrity Management - AIM Morgan City
Importance: Low

Incident Location

Country : USA
Site : Morgan City

Incident Details

Incident Number : USA03101
Incident date : 2019-08-11T15:00:00Z
Business Line : Industry Services - Asset Integrity Management Incident Category : Crank-Out Failure
Incident : Crank-out failure – 24HR NOTIF REQ

Client : Chevron JSM - Offshore

Incident Description

Failure to return source to shielded position

Action

Action Taken : The RSO upon notification of the incident arranged for a source-recovery trained individual for travel to site.

Reported by : William Johnston Intertek

Business Line Leaders/H&S Leads Notification

