

Mr. Jason VonEhr  
Health Physicist  
U.S. Nuclear Regulatory Commission, Region-IV  
1600 East Lamar Boulevard  
Arlington, TX 76011-4511

Subject: NRC Inspection 030-39167/2020-001 Request for Extension – April 20<sup>th</sup>, 2020

Dear Mr. VonEhr:

I am writing in response to the notice of violation letter we received from you on April 2<sup>nd</sup> with the amended copy coming on April 6<sup>th</sup>. Element Technical Services is requesting for an extension to give our formal response to the violation. Our business has been impacted significantly from the COVID-19 pandemic as well as the collapse of world oil prices over the last month. With so much uncertainty and change we do not feel that a formal response and commitment to addressing some of the violations by a certain date is feasible. Our hope is to meet with our team and a third-party company to address the violations and thus formally respond with our commitment to correcting them and satisfying the rules and regulations of the NRC. It is our thought that this action is not feasible until we have a better picture of how the COVID-19 pandemic will play out and thus would be untimely for us to formally commit to a hard date to correct the violations. Please note that we are not using this as an excuse to not correct the violations, but want to be sure that whatever actions we agree to can be achieved and will not be altered by the closures set in place due to the COVID-19 pandemic. Element is committed to meeting the requirements specified in the violation, however the limits on assembling groups which would be necessary for extended training is not possible at this time. With that said we are making efforts to move forward with correcting and improving some of the things in our radiation manual and pre-employment power point presentation.

I appreciate the consideration and look forward to your response.

Sincerely,

Travis Wyatt  
Radiation Safety Officer  
Element Technical Services