

APPENDIX

NOTICE OF VIOLATION

Robco Production Logging, Inc.
Snyder, Texas 79549

Docket No. 15000042
License No. Gen Lic 150.20

During an NRC inspection conducted on November 12, 1992, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 150.20(b)(1) requires that when engaging in activities in non-Agreement States under the general license granted by 10 CFR 150.20(a), you must file four copies of Form-241 (revised) "Report of Proposed Activities in non-Agreement States" and four copies of your Agreement State specific license with the Regional Administrator of the appropriate Nuclear Regulatory Commission Regional Office at least 3 days before engaging in such activity.

Contrary to the above, tracer work was performed throughout Oklahoma on July 22-23 and September 3-4, 1992, and on other occasions under the provisions of 10 CFR 150.20(a) without revising Form-241 dated December 26, 1991, to any NRC office.

This is a Severity Level IV violation (Supplement VI).

- B. 10 CFR 150.20 provides that persons who hold a specific license from an Agreement State are granted an NRC general license to conduct the same activity in a non-Agreement State provided the general license complies with 10 CFR 39.15, and 39.31 through 39.77.

1. 10 CFR 39.39 requires, in part, that each licensee maintain records of each use of licensed material.

Contrary to the above, as of November 12, 1992, no such records were available.

This is a Severity Level V violation (Supplement VI).

2. 10 CFR 39.67(e) requires that the licensee make a radiation survey at the temporary jobsite before and after each subsurface tracer study to confirm the absence of contamination.

10 CFR 39.67(f) requires that the licensee retain records of surveys for inspection by the Commission for 3 years after they are made.

Contrary to the above, as of November 12, 1992, no such records were available.

This is a Severity Level V violation (Supplement VI).

Pursuant to the provisions of 10 CFR 2.201, Robco Production Logging, Inc. is hereby required to submit a written statement or explanation to the Regional Administrator, Region IV, with a copy to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order or demand for information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Arlington, Texas
this 7th day of December, 1992

IFS Data Entry Form

Reviewed By: _____

Date: 12/07/92Site Name: ROBLO PRODUCTION LOGGINGReport Transmittal Date: 12/07/92Lead Inspector: SXRResponsible Org. Code: 4302Report End Date: 11/12/92Region: 4

Report NBR

A 92-02

Docket NBR

15000042

B _____

C _____

Materials Only

License NBR

General license150.20

*Docket Name

Update? (Y/N): N Opened IR/LER/P21 LOG/IFS Number: _____***Sequence NBR: 01 Item Type: VIOL **Severity: IV **Supplement: VI

Status	*UPD I/R	*Proj. Closeout	*Actual Closeout
A <u>0</u>	_____	<u>1/1</u>	<u>1/1</u>
B _____	_____	<u>1/1</u>	<u>1/1</u>
C _____	_____	<u>1/1</u>	<u>1/1</u>

10 CFR

150.20

Materials Only

License Cond.

Tie Down

Title: NOT FILING 241 FORM

(55 character width)

*Closeout Org: _____ *Closeout EMP: _____ *Contact EMP: _____ *Procedure: _____ *Functl Area: _____

*Cause CD: _____ **EA Number: _____ **NOV/NNC Issue Date: 12/07/92Text: See Attached AUpdate? (Y/N): N Opened IR/LER/P21 LOG/IFS Number: _____***Sequence NBR: 02 Item Type: VIOL **Severity: V **Supplement: VI

Status	*UPD I/R	*Proj. Closeout	*Actual Closeout
A <u>0</u>	_____	<u>1/1</u>	<u>1/1</u>
B _____	_____	<u>1/1</u>	<u>1/1</u>
C _____	_____	<u>1/1</u>	<u>1/1</u>

10 CFR

39.39

Materials Only

License Cond.

Tie Down

Title: NO Records of use of material

(55 character width)

*Closeout Org: _____ *Closeout EMP: _____ *Contact EMP: _____ *Procedure: _____ *Functl Area: _____

*Cause CD: _____ **EA Number: _____ **NOV/NNC Issue Date: 12/07/92Text: See attached B(1)

* Optional Fields.

** Severity, Supplement, and NOV/NNC only applicable for Violations; EA Number only applicable for Apparent Violations.

*** Sequence NBR is not applicable for docket related/P21, LER, or non-docket related items.

ITEMS CONTINUED? (Y/N): y