

APPENDIX A
NOTICE OF VIOLATION

Oil Well Perforators, Inc.
Box 399
Mills, Wyoming 82644

Docket: 30-13047
License: 49-17609-01
EA 85-53

Based on the results of an NRC inspection conducted on February 19-20, 1985, and March 27, 1985, several violations of NRC requirements were identified including a violation involving the use of licensed materials by unauthorized individuals. In accordance with the "General Statement of Policy and Procedures for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1985), the violations are listed below:

1. License Condition 12 requires, in part, that licensed material be used by or under the supervision and in the physical presence of one of the seven individuals specifically named.

Contrary to this requirement, on November 10-11, 1981, and February 1, 1984, licensed material was used by two different individuals who were neither named on the license nor under the supervision of one of the individuals named on the license.

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

2. Licensed Condition 18 requires, in part, that licensed material shall be used in accordance with statements, representations, and procedures contained in application dated September 15, 1982; letter dated February 3, 1983; and application dated September 29, 1983.

- a. Section 2 of the Radiation Safety Procedures contained in the application dated September 15, 1982, states, in part, that film badges will be worn by all personnel working with radioactive material.

Contrary to this requirement, film badges were not worn by two different individuals who worked with radioactive material on November 10-11, 1981, and February 1, 1984.

- b. Item I.d of the letter dated February 3, 1983, states, in part, that should one man use 50 millicuries or more (of iodine-131) in 1 week, he will be required to submit to a urine test.

Contrary to this requirement, during the period of September 10-13, 1984, an individual used 109 millicuries of iodine-131 tracer material without submitting to a urine test.

- c. Section 7, Item 3.4 of the Radiation Safety Procedures contained in the application dated September 15, 1982, states, in part, that the Radioactive Contamination Inspection Data Sheet is to be completed for every tracer operation.

Contrary to this requirement, on October 9 (two jobs), 11, and 22, 1984, a Radioactive Contamination Inspection Data Sheet was not accurately completed for four tracer operations performed in Fremont County, Wyoming; Summit County, Utah; Sooner County, Colorado; and Dawson County, Montana, respectively, because, probably as a result of an error in recording serial numbers, the survey instruments indicated on the data sheet as having been used on those dates were, in fact, being calibrated in Midland, Texas.

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

3. License Condition 16 requires, in part, that the licensee conduct a physical inventory every 6 months to account for all sealed sources possessed under the license and that records of the inventories include the quantities and kinds of byproduct material, location of sealed sources, and the date of the inventory.

Contrary to this requirement, records of inventories performed prior to January 1985 did not show the location of the sealed sources.

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

Pursuant to the provisions of 10 CFR 2.201, Oil Well Perforators, Inc. is hereby required to submit to this office, within 30 days of the date of this Notice, a written statement or explanation in reply, including for each violation: (1) the reason for the violation if admitted, (2) the corrective steps which have been taken and the results achieved, (3) the corrective steps which will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

Dated at Arlington, Texas
this 20th day of May 1985