



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

June 18, 2020

Mr. Travis Wyatt
Radiation Safety Officer
Element Technical Services, LLC
675 Hereford Lane
Casper, Wyoming 82609

SUBJECT: RESPONSE TO NRC INSPECTION REPORT 030-39167/2020-001, NOTICE OF VIOLATION

Dear Mr. Wyatt:

On April 1, 2020, the U.S. Nuclear Regulatory Commission (NRC) cited Element Technical Services, LLC, for a violation that involved the failures to: (1) provide radiation safety training at least equal to the criteria listed in Section 8.7.2 "Authorized Users," of NUREG-1556, Volume 4, Revision 1; and (2) develop, implement, and maintain operating, emergency, and security procedures that will meet the criteria in Section 8.10.6 "Operating, Emergency and Security Procedures," of NUREG-1556, Volume 4, Revision 1, including those addressing the use of fixed gauges at temporary job sites.


The NRC Inspection Report 030-39167/2020-001 with enclosed Notice of Violation required you to respond in writing in 30 days (NRC Agencywide Documents Access and Management System (ADAMS) Accession ML20093A737). You requested an extension of this due date in order to adequately address the Notice of Violation in a letter dated April 20, 2020 (ADAMS Accession ML20115E230), which was approved by the NRC in an email dated April 22, 2020 (ADAMS Accession ML20115E231) with a new due date of June 1, 2020. In a letter dated May 28, 2020, you provided your response to the Notice of Violation (ADAMS Accession ML20155K656).

After reviewing the information provided in your response to the Notice, we have concluded that your proposed actions appear to adequately address the regulatory noncompliances described in the Notice. We will review your implementation of these corrective actions during a future inspection to determine whether full compliance has been restored and whether compliance will be maintained.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedures," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

**Patricia
A. Silva**

 Digitally signed by
Patricia A. Silva
Date: 2020.06.18
13:25:17 -05'00'

Patricia A. Silva, Chief
Materials Inspection Branch
Division of Nuclear Materials Safety

Docket: 030-39167
License: 49-35541-01

cc:
Doug Gumm
Radiological Services Manager
Wyoming Office of Homeland Security
5500 Bishop Blvd.
Cheyenne, WY 82009

RESPONSE TO NRC INSPECTION REPORT 030-39167/2020-001, NOTICE OF VIOLATION
- DATED June 18, 2020

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ADAMS ACCESSION NUMBER:

☒ SUNSI Review:

ADAMS:

☐ Non-Publicly Available

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Keyword:

By: JEV

☒ Yes ☐ No

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NRC-002

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