



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

January 4, 2012

NonDestructive and Visual Inspection, LLC  
ATTN: Paul Fraley  
Radiation Safety Officer  
901 Oak Street  
Houma, Louisiana 70363

SUBJECT: CORRECTED COPY

Dear Mr. Fraley

Please find enclosed Corrected Copy to Amendment Number 01 to NRC License Number 17-29410-01. **During an internal review it was determined that you are not authorized to perform industrial radiography in lay barges because you did not submit the emergency and operating procedures for the aforementioned work. Title 10 Code of Federal Regulations Part 34.41(c) requires that a licensee may only conduct lay-barge, offshore platform or underwater radiography only if procedures have been approved by the NRC or by an agreement state. If you would like to perform industrial radiography in lay barges please submit in the form of an amendment request, the operating and emergency procedures for lay-barge that address the following safety aspects:**

- 1. Procedures, as required to comply with 10 CFR 34.45(a), unique to lay-barge radiography, to minimize the potential for a source disconnect.**
- 2. Emergency procedures, as required by 10 CFR 34.45(a), unique to lay-barge radiography, to address unintentional source disconnects and recovery. These procedures should address minimizing radiation exposure for all personnel onboard the lay-barge during a disconnect event, including considerations such as staff training, availability of portable shielding, survey instruments, dosimetry, and other equipment.**
- 3. Operating procedures and practices unique to lay-barge radiography to ensure compliance with 10 CFR 34.41 requirements for personnel to be present during radiography and 10 CFR 34.46 requirements for supervision of radiography assistants.**
- 4. Operating procedures and practices, as required to comply with 10 CFR 34.45(a) to ensure that radiography personnel have the authority necessary to protect personnel onboard the lay-barges from radiation doses in excess of regulatory limits. These should include provisions to ensure that radiographic operations are conducted only in those locations shielded for such operations (if those enclosures are relied upon to control dose) and that radiographic personnel can direct personnel as necessary for radiation safety both during normal operations and in the event of a disconnect or other emergency.**

An environmental assessment for this action is not required, since this action is categorically excluded under 10 CFR 51.22(c)(14)(vi). You should review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or if you have any questions, contact me at 817-200-1596.

NRC's Regulatory Issue Summary (RIS) 2005-31, provides criteria to identify security-related sensitive information and guidance for handling and marking of such documents. This ensures that potentially sensitive information is not made publicly available through ADAMS. The RIS may be located on the NRC Web site at: <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2005/>. Pursuant to NRC's RIS 2005-31, the enclosed materials license will not be made publicly available.

NRC will periodically inspect your radiation safety program. Failure to conduct your program according to NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC may result in enforcement action against you. This could include issuance of a notice of violation; imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the NRC Enforcement Policy. The NRC Enforcement Policy is available on the following internet address: <http://www.nrc.gov/reading-rm/doc-collections/enforcement/actions/>

An electronic version of the NRC's regulations is available on the NRC Web site at [www.nrc.gov](http://www.nrc.gov). Additional information regarding use of radioactive materials may be obtained on the NRC Web site at <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

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

Thank you for your cooperation.

Sincerely,

**/RA/**

Lizette Roldán-Otero, Ph.D., Health Physicist  
Nuclear Materials Safety Branch B

Docket: 030-38376  
License: 17-29410-01  
Control: 575425

Enclosure: As stated