

Hill, Carol

From: Campbell, Vivian
Sent: Tuesday, September 12, 2017 2:43 PM
To: Hill, Carol
Subject: FW: RE: Publication and Safety Meeting topics of the Order
Attachments: Boundary Awareness Training.xlsx; Boundary Awareness.pdf

PUBLIC
 Immediate Release
 Normal Release

From: Kyle Dickerson [mailto:kdickerson@acuren.com]
Sent: Tuesday, September 12, 2017 2:28 PM
To: Campbell, Vivian <Vivian.Campbell@nrc.gov>
Subject: [External_Sender] RE: Publication and Safety Meeting topics of the Order

NON-PUBLIC
 A.3 Sensitive-Security Related
 A.7 Sensitive Internal
 Other: _____

Reviewer: JFK/CH **Date:** 9/25/17

Vivian,
I discussed with Mark Shaffer about using the boundary awareness as my safety meeting agenda, attached is that document as well as the agenda list that will be the topics covered. Let me know if this is approved and I will be holding the training this week if that works

Kyle Dickerson (907)953-0420
Acuren Inspections
API 653 / API 570 / STI
NDE Technician

From: "Campbell, Vivian" <Vivian.Campbell@nrc.gov>
Sent: Tuesday, September 12, 2017 11:18 AM
To: "kdickerson@acuren.com" <kdickerson@acuren.com>
Subject: RE: Publication and Safety Meeting topics of the Order

Mr. Dickerson,

This email acknowledges receipt of your response to the conditions of the Confirmatory Order issued July 11, 2016. We have completed our review the documents submitted and find them to be responsive to certain conditions of the Order. However, two items still need to be submitted before NRC can close out the Order.

- 1) Condition V.A. requires you to provide training to Acuren USA radiographers and radiographer's assistants, which was intended to convey personal lessons learned from the associated issue. You were required to submit the training agenda, materials or content to Region IV. Please complete the actions of this condition, submit the agenda, and inform Region IV when this training has been presented. Please note this action should be completed promptly.
- 2) Condition V.C. requires you to provide the Region IV demonstrations of at least two attempts to publish the article. Please provide the names of the organizations that you submitted the article for publications and their contact information.

If you have any questions, please contact me by email or by phone.

Respectfully,

Vivian Campbell, Chief
Materials Licensing and Inspection Branch
Division of Nuclear Materials Safety
Region IV
Office: 817-200-1455

“Is there anyone in that office?” “What is on the other side of that wall?” “Can anyone access above or below me from an area outside my boundary?”

These are all questions that should be crossing your mind while filling out your Daily Radiation Report, completing your Job Hazard Analysis, and calculating your boundaries. It is much easier to spend the extra 10 minutes doing a thorough walk-down and looking for any “what if” scenarios prior to the radiographic operations than it is to accidentally expose a member of the general public. A boundary breach or overexposure can be easily avoided with the help of these following steps.

1: In most circumstances, the client that requests the radiography gets in touch with the technician to schedule the radiography to be performed. This is the perfect opportunity to ask a few simple questions that will help plan your work.

A: Where will the radiographic operations be taking place?

B: Is there, or will there be any other employees working at the job site location where work is to be performed.

C: Is there any reason a 100% boundary will not be achievable (In this case an alternate location shall be considered.

D: If other workers are nearby, have they been given entry level training on radiographic operations and the importance of the yellow and magenta radiation tape.

2: Every job performed should have a job safety hazard analysis performed on it. The following is a small checklist of items that should be considered when completing the JHA.

A: The JHA is intended to be filled out on the job site while looking at the real-time hazards that are present at the time the radiographic operations are taking place.

B: An inspection type JHA should have a section with a separate checklist to be completed prior to operations that should include radiation safety gear cross checks, 2mr and 100mr boundary cross checks, and an inspection of the radiation equipment itself including a source and associated radiographic equipment to be used. If ANY equipment has any defects or is not in good working condition, it shall be immediately taken out of service, reported to your RSO, and replaced with new equipment prior to operations.

C: If the work conditions change at all during radiographic operations, the JHA should be updated with all members of the crew and resigned prior to restarting operations.

3: After all of the pre-job steps are followed, boundaries are up, and work is ready to begin one final walk around should be performed. This should include a cross check of anything that another crew member did to make sure the task was completed, as well as looking for any other possibilities that a member of the general public could make their way into your restricted area.

All of the above steps will make sure that your radiographic operations will go smoothly, reduce the possibility of a radiation incident from taking place, and will help result in everybody making it home to their loved ones and families safely.

