



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

February 25, 2004

ProTechnics (Division of Core Laboratories LP)
ATTN: Will Williams
Radiation Safety Officer
6316 Windfern
Houston, Texas 77040

SUBJECT: INITIAL NRC FORM 241 FOR CALENDAR YEAR 2004

Mr. Williams:

This letter acknowledges receipt by the NRC Region IV office of your initial NRC Form 241 dated February 13, 2004, and the attached \$1500 application fee. In accordance with NRC regulations, this NRC Form 241 was submitted by ProTechnics to report proposed generally licensed activities in NRC jurisdiction while working under the provisions of 10 CFR 150.20.

Please note that the intent of 10 CFR 150.20 is to authorize Agreement State licensees to work in NRC jurisdiction for specified periods of time without having to obtain a specific NRC license. Since ProTechnics currently possess an NRC license that authorizes the activity identified in your NRC Form 241, all licensed activities must be conducted under the provisions of this NRC license. Based on our conclusion that your NRC license authorizes the activity requested, and the fact that you are required to work under your NRC license in NRC jurisdiction when performing activities specifically authorized on your NRC license, we are returning your NRC Form 241 and application fee.

In our technical review we noted that your NRC license authorizes the use of pipe collar markers in quantities not to exceed 50 μCi of cesium-137, and your NRC Form 241 request authorization to use 100 μCi of cesium-137 as authorized by your State of Texas license. Authorization to use radioactive markers with activities greater than 50 μCi of cesium-137 can be considered for approval on a case-by-case basis. However, approval of this request would require a modification to the current exemption granted to ProTechnics. When this exemption is reviewed and approved by NRC, your license will be amended accordingly.

On February 24, 2004, we received ProTechnics' amendment request for License No. 42-26928-01 requesting an increase in the amount of activity per pipe collar markers containing cesium-137 from 50 μCi per marker to 100 μCi per marker. Since this is an increase in the currently authorized exemption to 10 CFR 39.47, it will be necessary for us to send your request to our headquarters office as a Technical Assistance Request (TAR). We plan to expedite your amendment request in our Region IV office and work collegiately with the Office of Nuclear Materials Safety and Safeguards in the TAR process. However, based on your immediate needs, we cannot ensure that your request will meet the time line proposed in the NRC Form 241.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have questions concerning this letter or other aspects of working in NRC jurisdiction under reciprocity, please contact me at 817-860-8299.

Sincerely,

/RA/

Judith Walker, Health Physicist
Nuclear Materials Licensing Branch

Enclosure: As stated

cc w/ copy of NRC Form 241 and Materials License:
241 File