

**COMPUTALOG**



Precision Drilling

XB001305/01  
11005483

December 24, 2004

Computalog USA, Inc.  
363 N Sam Houston Pkwy E  
Suite 1700  
Houston, TX 77060

Margaret M. Doane  
Deputy Director  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike, OWFN  
Rockville, Maryland 20852-2738

Re: Amendment to NRC Export License XB001305

Computalog USA, Inc. dba Computalog Wireline Products, a division of Precision Drilling TSG wishes to amend NRC export license XB001305 to allow additional sources to be exported under this current license. These sources will be used to replace previously exported sources which have become lodged downhole and are now permanently irretrievable and inaccessible and therefore unusable. This is not an uncommon occurrence in well logging operations and there is no cause for alarm. I would refer you to 10 CFR 39.77 and Jack Whitten of NRC Region IV, if you have any concerns related to irretrievable well logging sources. This event had been reported to NRC OIP via email on November 12, 2004.

In consideration of 10 CFR 110.41(a)(8) as well as 110.40, this amendment request will require only Executive Branch review and does not require Commission (Commissioners) review. Therefore please find enclosed a check for the fee of \$6000 as specified in 10 CFR 170.31 Category 15 B.

To obviate the need for repeated NRC and Executive Branch review of amendments needed for any future replacements of irretrievable sources lodged downhole, and in consideration of the substantial monetary costs and delays involved, Computalog requests the latitude to export additional sources in the future beyond this initial direct one-for-one replacement. Specifically, we wish to have the ability to allow multiple shipments of one-for-one replacement sources over a period of 5 years, or until the end of the contract with Cairn Energy India, whichever is sooner, without having to request future amendments. This ability to permit multiple shipments is provided for in 10 CFR 110.31(e). Computalog agrees to abide by all existing license conditions for any future shipments which include, among other things, transmitting the details of each shipment to

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NRC and specific state agencies. In making this request for multiple future shipments, we wish to emphasize that we do not want the request in any way to prevent or delay the expeditious review by NRC and the Executive Branch toward granting our immediate amendment request for this initial shipment of one-for-one replacement sources shown on the attached list.

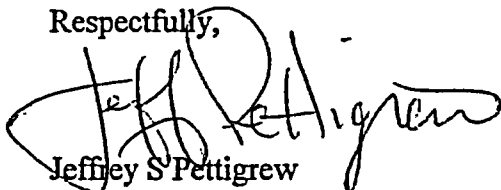
Computalog USA, Inc. contends that the proposed export or reexport of byproduct radioactive material to India is not inimical to the common defense and security of the United States as described in 10 CFR 100.42(a)(8) and (c). Also be aware that we have previously submitted a Responsible Persons list to Janice Dunn Lee of NRC OIP on August 18, 2004 and previously received SGI-M information related to this license.

Please find attached the list of sources needed to replace those irretrievable in India. Note that only the Americium-241(Be) source requires a specific license for exportation, as it exceeds the threshold specified in 10 CFR 110.23(a)(3). The Cesium-137 source can be exported under general license, under the provisions of 10 CFR 110.23(a).

Please be aware that Computalog USA, Inc. will undergo a name change to Precision Energy Services, Inc. effective January 1, 2005. The legal entity will remain the same and continue to use the existing Federal Employer Identification Number 76-0224331.

If you have any further questions related to the is matter, please do not hesitate to contact me at 281-260-5619.

Respectfully,



Jeffrey S Pettigrew  
US Radiation Safety Officer  
Computalog USA, Inc.

Attachments:  
List of original & replacement sources  
Check No.525124 for \$6000

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**List of One-for-One Replacement Sources**  
**Re: NRC License XB001305**  
**Issued to Computalog for Cairn Energy India PTY Ltd**  
**Contract #RJ4LA00000**

Item No.	Mfg. Model (Ser. No)	Radioactive Isotope	Activity	No. of Sources	Use	Name of Supplier
1	AEA CDC.CY16 (08184B)	Cs-137	[REDACTED]	[REDACTED]	Downhole Well Logging	Computalog USA, Inc.
2	AEA AMN.CY20 (299NN)	Am-241(Be)	[REDACTED]	[REDACTED]	Downhole Well Logging	Computalog USA, Inc.

Note 1: [REDACTED]  
 Note 2: Only Item 2 requires a specific license as per 10 CFR 110.23(a)(3)

**List of Original Sources Now Irretrievable**  
**Re: NRC License XB001305**  
**Issued to Computalog for Cairn Energy India PTY Ltd**  
**Contract #RJ4LA00000**

Item No.	Mfg. Model (Ser. No)	Radioactive Isotope	Activity	No. of Sources	Use	Name of Supplier
1	AEA CDC.CY16 (08188B)	Cs-137	[REDACTED]	[REDACTED]	Downhole Well Logging	Computalog USA, Inc.
2	AEA AMN.CY20 (08148B)	Am-241(Be)	[REDACTED]	[REDACTED]	Downhole Well Logging	Computalog USA, Inc.

Note 1: These sources are now irretrievable, lodged permanently downhole and cemented in place in the [REDACTED]  
 Note 2: [REDACTED]  
 Note 3: Only Item 2 required a specific license as per 10 CFR 110.23(a)(3)

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