



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
AIR AND RADIATION

MAR 3 2005

Mr. Mark A. Satorius, Director
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission
Region IV
811 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4006

MAR 10 2005

Dear Mr. Satorius:

This is in response to your letter of January 7, 2005, to Bruce Kobelski of the Environmental Protection Agency's (EPA) Office of Ground Water and Drinking Water (OGWDW). That letter was sent requesting comments on a draft environmental assessment (EA) in support of a request by Core Laboratories, Inc., to increase the exempted amount of cesium-137 to be placed in drill collars for well logging purposes to 100 μ Ci from the existing 50 μ Ci. While EPA's OGWDW is responsible for approvals of injection and disposal wells, EPA's Office of Radiation and Indoor Air, Radiation Protection Division and regional office radiation protection staff provide assistance on radiation related matters, so they have asked that we respond in this instance.

In our review, we agree with the draft EA that the levels of radiation associated with the request for exemption are within occupational limits, and should not, in most circumstances of due professional care, result in human health or environmental impacts. However, we are concerned that as in other types of uses of small quantities of radioactive material, the potential exists for unintentional releases or failure to track these radioactive sources. In this case, while Core Laboratories has provided assurances that it will collect any well pipe collars with cesium-137 or other licensed radioactive byproduct materials from pulled casings, we believe that additional controls are warranted.

Property ownership and interests in oil and gas fields are frequently transferred between companies in the petroleum industry, and consistency in use of contractors and subcontractors servicing individual fields during the decades of production common to producing wells cannot be guaranteed. Record keeping on the presence of such collars on individual wells may not readily be assured in such an unpredictable ownership and servicing chain, and the potential for release of radioactive pipe into the metal recycling market is increased.

We believe that an additional requirement is necessary to track these sources and provide assurance that they are collected when well casings are pulled, especially prior to work overs or abandonment. We recommend to you that, as a condition of approving this license exemption, the Nuclear Regulatory Commission have Core Laboratories provide notice of which wells have the radioactive collars installed to the Federal or State natural resource agency which provides the operating permits for the wells so those agencies can include that information in the appropriate well files. At the time of future work over or abandonment approval where well casings are to be pulled, the appropriate agencies can provide an additional control over the handling and disposal of this radioactive material.

Should you have any questions on this matter, please contact Mr. Loren Setlow at 202-343-9445 or by e-mail at setlow.loren@epa.gov .

Thank you for the opportunity to comment on this license amendment and associated EA.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Gitlin". The signature is fluid and cursive, with a large initial "B" and "G".

Bonnie Gitlin, Acting Director,
Radiation Protection Division
Office of Radiation and Indoor Air

cc: Bruce Kobelski, Office of Water
George Brozowski, Region 6