Raymond N. Dickes
Radiation Safety Officer
Explosives Safety Officer
Oilfield Services

Schlumberger

RECEIVED
JAN - 9 2009
DNMS

January 8, 2009

Nuclear Regulatory Commission
Region IV
612 East Lamar Blvd., Suite 400
Arlington, Texas 76011-4125

RE: Reply to a Notice of Violation; EA-08-261

Dear Sirs:

I am writing in response to the **Notice of Violation; EA-08-261**, included in your letter dated December 1, 2008. Schlumberger identified this violation during the course of our investigation in October 2007 and identified this in our report to the Nuclear Regulatory Commission (NRC), dated November 15, 2007. In the following paragraphs you will find: 1) The reason Schlumberger believes that the violation occurred; 2) The corrective actions already taken and completed, and the results Schlumberger believes it has achieved; 3) The corrective actions both completed and planned to prevent a reoccurrence; and 4) The date when Schlumberger believes full compliance was achieved.

Reason for the Violation

Some employees mistakenly believed either that:

1. The fluid density meters (densitometers) did not require the hazardous material shipping paper because of the smaller activity of the source contained within the meters; or
2. A hazardous material shipping paper was not required for each shipment. This belief resulted from a discontinued procedure where a hazardous material shipping paper which identified all hazardous materials routinely carried on the vehicle was produced and carried on the vehicle continuously. Thus eliminating the need to complete a hazardous material shipping paper was not required for each shipment.

Corrective Actions Already Completed and Results

Remedial training on completion of shipping papers was conducted with all Rock Springs employees in December 2007 and January 2008. Full compliance was achieved based on the results noted in a follow-up audit conducted by Thomas Wood, Deputy Corporate Radiation Safety Officer (RSO), on March 25-27.

200 Gillingham Lane, Sugar Land, Texas 77478 Tel. (281) 285-8775 Fax (281) 285-8526

Corrective Actions to Prevent a Reoccurrence

The routine training program used for employees working with these gauges already included the requirements for shipping the gauges, including the shipping papers required. This program is being revised to increase emphasis on these requirements. The revised program will be released by July 1, 2009.

Schlumberger will assess the continued compliance in the Rock Springs, WY location with an unannounced audit from my office in 2009.

Date Full Compliance Will Be Achieved

Full compliance was achieved no later than March 27, 2008, based on the results noted in a follow-up audit conducted by Thomas Wood, Deputy Corporate RSO, on March 25-27, 2008.

Please contact me if you require clarification or additional information regarding this violation.

Sincerely,

Raymond Dickes