



Pioneer Wireline Services, LLC  
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Tuesday, September 28, 2010

Nuclear Materials Licensing Branch  
 U.S. Nuclear Regulatory Commission, Region IV  
 612 E. Lamar Boulevard, Suite 400  
 Arlington, TX 76011-4125

Reference: Request for variance of 6-month calibration requirements for Neutron Meter;  
 RAM License No. 25-27802-01, Docket No. 030-36849

Dear Sir,

Pioneer Wireline Services, LLC, dba Competition Wireline Services, is requesting a variance from the requirements of 10 CFR Part 39.33 (c)(1) "The licensee shall have each radiation survey instrument required under paragraph (a) of this section calibrated – At intervals not to exceed 6 months and after instrument servicing;"

Pioneer has purchased a Ludlum Model 12-4 Neutron Survey Meter. This meter is only used to survey storage facilities and to determine transport index of DOT 7A Type A containers. The meter is not used at temporary jobsites and therefore not subject to the rigorous handling other field service meters are exposed to.

Pioneer is requesting that this meter be deferred from the 6 month calibration requirement and instead be placed on a calibration schedule of every 12 months. This variance will only apply to this model survey meter. All other radiation survey instruments shall be calibrated on a six month schedule.

Thanks and Best Regards

George M. Doggett

Pioneer Radiation Safety Officer

Director Explosives, Radiation, and Offshore Safety

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cc: Monte Doenz, Site RSO, Billings, MT

### Neutron Meters

Model	Detector Range	Sensitivity	Gamma Rejection	Neutron Energy Response	Part Number
12-4	0-100 mSv/h (0-10,000 mrem/hr)	10 cps/mSv/h (100 cps/mrem/hr)	≤ 10 cps through 0.1 Sv/h (10 R/hr)	provides an appropriate inverse RPE curve for neutrons from thermal through 7 MeV, provides response up to 12 MeV	48-1200
2241-4	0-100 mSv/h (0-10,000 mrem/hr)	10 cps/mSv/h (100 cps/mrem/hr)	≤ 10 cps through 0.1 Sv/h (10 R/hr)	provides an appropriate inverse RPE curve for neutrons from thermal through 7 MeV, provides response up to 12 MeV	48-2972
2363 w/41-41L	Neutrons: 0.1 mrem/hr-1 rem/hr Gamma: 0.1 mR/hr-1 R/hr	Neutrons: 50 cps/mrem/hr Gamma: 1000 cps/mR/hr	≈ 400 cps @ 100 mR/hr (10 <sup>-3</sup> R)	thermal to 100 MeV	48-3514
15	0-500,000 cps	Neutrons: 55 cps/mrem/hr Gamma: 2100 cps/mR/hr 25 Efficiency: 10 <sup>4</sup> cps/mrem/hr 7% <sup>252</sup> Cf 7% <sup>240</sup> Pu	≤ 10 cps through 0.1 Sv/h (10 R/hr)	not linear through energy spectrum (0.025-12.0 MeV)	48-1614

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BETWEEN:

Accounts Receivable/Payable  
and  
Regional Licensing Branches

[ FOR ARPB USE ]  
INFORMATION FROM LTS

Program Code: 03111  
Status Code: Pending Amendment  
Fee Category: 5A  
Exp. Date:  
Fee Comments:  
Decom Fin Assur Req: N

**License Fee Worksheet - License Fee Transmittal**

**A. REGION**

1. APPLICATION ATTACHED

Applicant/Licensee: PIONEER WIRELINE SERVICES, LLC  
Received Date: 10/15/2010  
Docket Number: 3036849  
Mail Control Number: 574182  
License Number: 25-27802-01  
Action Type: Amendment

2. FEE ATTACHED

Amount: \_\_\_\_\_  
Check No.: \_\_\_\_\_

3. COMMENTS

Signed: Colleen Murnahan  
Date: 1-4-2011

**B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / / )**

1. Fee Category and Amount: \_\_\_\_\_

2. Correct Fee Paid. Application may be processed for:

Amendment: \_\_\_\_\_  
Renewal: \_\_\_\_\_  
License: \_\_\_\_\_

3. OTHER \_\_\_\_\_  
\_\_\_\_\_

Signed: \_\_\_\_\_  
Date: \_\_\_\_\_