



**NABORS COMPLETION &
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United States Nuclear Regulatory Commission Region 1
2100 Renaissance BLVD. Suite 10
King of Prussia, PA 19406
Attn: Mr. Blake Welling

March 30th, 2015

Re: Expedited License Amendment Request pertaining to "the use of sealed sources in wells without surface casing. Specific License 37-30412-01 / 1030-34542"

Dear Mr. Welling,

Nabors Completion & Production Services, Co. (NCPS) requests an amendment to their current Specific License (37-30412-01).

NCPS would like to conduct operations which would include the use of sealed sources in wells without surface casing for protecting fresh water aquifers. NCPS requests that the amendment be expedited as soon as possible. If the job proposal is accepted it is possible that NCPS will be expected to start the job early to mid, April 2015. I have faxed this letter to you directly to save time pertaining to the amendment so that possible financial hardship for NCPS could be avoided if the amendment was not completed in time. For informational purposes we are currently approved by the New York State Department of Health (License# C3130) and the Ohio Department of Health (License# 03111990003) and have license conditions allowing the use of sealed sources in wells without surface casing.

Included within this amendment request for your review is a copy of the NCPS "Use of Sealed Sources in Wells Without Surface Casing" procedure.

NCPS will continue to ensure compliance with all regulations, license conditions and procedural requirements

NCPS requests any correspondence regarding this amendment be sent to the contact at the below address. Thank you for your assistance in this matter. Please feel free to contact me via telephone (412-977-8359) if you need any additional information in regards to this amendment request.

Thank you very much, we appreciate it.

Dustin L. Jones
HSE Radiation & Explosives Manager
Radiation Safety Officer

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NMSS/IGNI MATERIALS-002



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Nabors Completion & Production Services Co.
Use of Sealed Sources in Wells Without Surface Casing

Introduction:

10 CFR 39.63 requires that Nabors Completion & Production Services Co. (NCPS) develop and follow a written procedure that covers the handling and use of licensed materials including the use of sealed sources in wells without surface casing for protecting fresh water aquifers. NUREG 1556 Volume 14 Part 8.10.12.4 allows for NCPS to log these wells after gaining approval from the USNRC or Agreement State. This approval is dependent upon NCPS' ability to reduce the likelihood of the logging sources becoming stuck in the well.

Purpose:

The purpose of this procedure is to familiarize the individual running a log in a well without surface casing for protecting fresh water aquifers with the steps necessary to safely and effectively log the well without incident.

Scope:

These procedures are generic to provide direction to all individuals running a log in a well without surface casing for protecting fresh water aquifers with any of Nabors Completion & Production Services Co. sealed radioactive sources. The USNRC and each Agreement State require specific steps be followed for these wells. Please consult the regulations governing your local radiation safety program for any items not covered in this procedure.

References:

10 CFR 39.63; NUREG 1556 Vol 14 8.10.12.4

Preparing to Log in a Fresh Water Aquifer:

Logging in a fresh water aquifer is a prohibited activity without prior approval from the USNRC or Agreement State where the well is located. The approval process requires that NCPS put several steps in place to reduce the likelihood of the toolstring containing radioactive material becoming stuck in the well.

* DO NOT LOG IN A FRESH WATER AQUIFER WITHOUT HAVING PRIOR
APPROVAL*

Step 1:

The logging supervisor must obtain specific knowledge of the borehole conditions from the drilling team or company. This knowledge and data must be reviewed for potential problem areas.

Step 2:

The logging supervisor must run a caliper log to verify that the hole is open or to locate the specific problem areas if there are any present. This must be completed prior to logging the well with a toolstring containing radioactive materials.

Step 3:

The logging supervisor must run the proposed toolstring, which will later be utilized to physically log the well, without radioactive sources to show it can be freely removed from the wellbore.

Step 4:

In the event that there is a specific problem area, the logging supervisor must coordinate the required personnel to place a temporary casing in sections of the wellbore giving problems.

This procedure must be followed for any well lacking the necessary surface casing to protect fresh water aquifers. Any questions regarding this procedure must be brought to the attention of your manager or the Radioactive Materials Compliance department listed below.

Radiation & Explosives Manager / Corporate RSO: Dustin Jones

Telephone: Office 724-746-9981 Mobile 412-977-8359

This is to acknowledge the receipt of your letter application dated

03/30/2015, and to inform you that the initial processing which includes an administrative review has been performed.

There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 586 457
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.