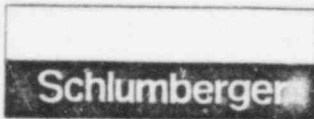


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SCHLUMBERGER-DOLL RESEARCH OLD QUARRY ROAD - P. O. BOX 307 RIDGEFIELD, CONN. 06877 203-438-2631

September 21, 1979

U. S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, Pa. 19406

Attention: Boyce H. Grier, Director

Gentlemen:

Regarding the recent Nuclear Regulatory Commission IE Bulletin No. 79-19 relating to packaging of low level radioactive waste for transport and burial, Schlumberger has a continuing concern.

While it is believed that the procedures currently practiced by the Schlumberger-Doll Research Center (SDR) meet NRC and DOT regulations, the following actions have been or will be taken pursuant to said bulletin:

1. Current sets of DOT and NRC regulations concerning the transfer, packaging and transport of low-level radioactive waste material have been and will continue to be maintained;
2. License requirements placed on Schlumberger's waste disposal contractor, Teledyne Isotopes of Westwood, New Jersey, have been obtained and will hereafter be maintained up-to-date;
3. Those persons at SDR responsible for the safe transfer, packaging and transport of low-level radioactive materials will henceforth be recorded in an attachment to written "Procedures for the Disposition of SDR Radioactive Materials";
4. Management approved, detailed written instructions and operating procedures for packaging and transfer of low-level radioactive material, entitled "Procedures for the Disposition of SDR Radioactive Materials" are currently under preparation to be completed on or before January 4, 1980;
5. SDR will implement on or before January 4, 1980 a program to train all personnel involved in the transfer, packaging and transport of radioactive material to familiarize said personnel in both the DOT and NRC regulatory requirements as well as the

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"Procedures for the Disposition of SDR Radioactive Materials." Retraining will be accomplished at least annually and records of training and retraining dates will be maintained;

6. At the present time, SDR does not perform any processes which generate low-level radioactive waste. Those materials which SDR packages for disposal are articles of manufacture such as old "sources" and broken or unsatisfactory particle accelerator tubes. If SDR at any time in the future adopts processes which generate radioactive byproducts, appropriate personnel training and retraining programs will be adopted to insure the minimization of the generation of radioactive wastes;

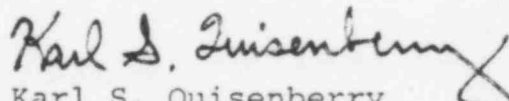
7. A management-controlled audit function of all radioactive waste material transfer, packaging and transport activities will be established and implemented on or before January 4, 1980 to assure that personnel, instructions and procedures, and process and transport equipment are functioning to ensure safety and compliance with regulatory requirements;

8. A management-controlled audit of SDR activities associated with the transfer, packaging and transport of low-level radioactive waste will be performed on or before October 8, 1979 and at least annually thereafter. Permanent records of all such audits will be maintained; and

9. In response to three questions posed in IE Bulletin No. 79-19 the following answers are provided:

Two shipments of low-level radioactive waste were made in 1978 and none during the first six months of 1979. The two 1978 shipments included 76 lbs. of depleted U<sup>238</sup> and 90 Ci of Tritium. No low-level radioactive liquid waste was generated or shipped during that period.

Very truly yours,

  
Karl S. Quisenberry  
Director - Nuclear

KSQ:kah

cc: NRC Office of Inspection and Enforcement  
Division of Fuel Facility and Materials  
Safety Inspection  
Washington, D. C. 20555

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