

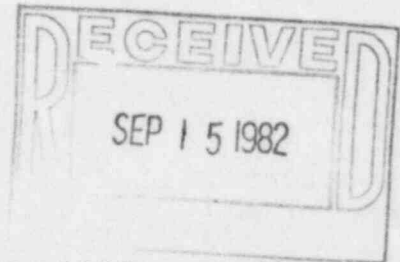
MOBILE #622-7211
#8146
#8147

Docket: 30-14697

September 8, 1982

License: 35-18229-01

United States
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Ste 1000
Arlington, Tx. 76012



Attn: Glen E. Brown, Chief
Technical Program Branch

In response to letter dated August 16, 1982 regarding notice of violations.

- Violation I. License condition 13(a) requires, in part that sealed sources shall be tested for leakage or contamination at intervals not to exceed 6 MO.
- A. In response to Violation I pulled files on sources which consists of three sources.
- SOURCE 71-1-255G Leak tested May 3, 1982
Results Negative.
- SOURCE 71-1-348G Leak tested May 3, 1982
Results Negative.
- SOURCE 71-1-446B Leak tested May 3, 1982
Results Negative.
- B. We instituted a tickler file for all records pertaining to Sources, Leak Test Dates, Calibration Dates in files showing that Leak Tests on all Sources will be due again in November, 1982.
- C. In compliance on Violation I date 8/23/82.

Violation II. License condition 18 requires, in part, that the licensee shall conduct a physical inventory of all sealed sources at 6 Mo. intervals and shall maintain the records of the inventories for 2 years from date of inventory.

- A. Conducted a physical inventory of the three sources we have in our possession of July 27, 1982. Made records available in files.
- B. Inserted appropriate data in new tickler files showing that another physical inventory will be due in January, 1983.
- C. In full compliance to Violation II on July 27, 1982.

Violation III. 10 CFR 19.11 (a) Requires, in part, that each licensee shall post current copies of specified regulations and the license or a notice specifying where such documents may be examined.

- A. We posted a bulletin in the shop office which all the men frequent stating that copies of NRC regulations parts 19 & 20, and of the Well Logging licence are available for inspection in the files in the main personnel office. The Bulletin also describes the purpose of these regulations.
- B. In conjunction with the previous posting on bulletin board we put a card stating the same in a packet on each truck. Contained in the packet are a copy of the Nuclear License, a copy of the last Leak Test taken on the source they are using. Also therein is a document showing details of source holder & container. Plus a copy of the operating Procedure Manual for the company.
- C. In Compliance with Violation III on August 23, 1982.

Violation IV. 10 CFR 19.11 (c) Requires that form NRC-3 "Notice To Employees" shall be posted by each licensee wherever individuals work in or frequent any portion of a restricted area.

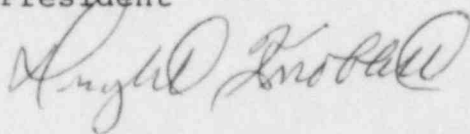
- A. We posted a copy of NRC-3 form on bulletin board in shop office where employees frequent everyday.
- B. We posted a copy of NRC-3 form in each truck on wall of working cabin.
- C. In full compliance of Violation IV 10 CFR 19.11 (c) on August 23, 1982.

Violation V. License Condition 17 requires, in part, that licensed activities be conducted in accordance with statements, representations, and procedures contained in your application. Item G page 5 of our procedures requires that records of radiation surveys of the shipping container, passenger cab of the wireline vehicle, Job Site, Down Hole Storage Area, and records of survey Meter Calibrations shall be maintained.

- A. We have changed the form for recording the survey's on shipping container and Downhole Storage. I'm sending a copy of the forms we are using with this letter and hope they meet with your approval.
- B. A copy of each survey taken on shipping container on well site is brought into office with the Job Ticket and placed in file marked Radioactive Monitoring & Shipping.
- C. Subject: Records of survey meter calibrations. As indicated to Mr. Noah Shopenn the inspector that made the inspection on July 22 & 23, 1982 we were unable to locate the calibration records in our files. After some extensive searching were still unable to locate them. We assume that the file must have gotten lost in our move from one location to another.
- D. We have had to start a new file on Calibration Records. We have two meters that are due for calibration in September, 1982 and were sending them in for calibration. Also in our new tickler files we are putting in the necessary information to flag dates that the meters are due for re-inspection. Hopefully this will meet with your approval and we can be in compliance with all the regulations in September, 1982.

Sincerely,
Well Logging Inc.

Dwight Knoblett
President



WELL LOGGING INC.

Radioactive Shipping and Monitoring Form

Route: Coming From _____ Location _____ Date _____
 Going To _____
 Return To _____

NATURE AND QUANTITY OF CONTENT				PACKAGE			
RADIONUCLIDE	GROUP	FORM	ACTIVITY	NUMBER OF PACKAGES	CATEGORY	TRANSPORT INDEX	TYPE
NAME OR SYMBOL OF PRINCIPAL RADIOACTIVE CONTENT	SPECIAL FORM GROUP NUMBER OF GROUPS I TO VII	CHEMICAL FORM AND PHYSICAL STATE (GAS / LIQUID / SOLID) OR SPECIAL FORM	NUMBER OF CURIES, OR MILLI-CURIES		I - WHITE OR YELLOW OR III - YELLOW LABEL	FOR YELLOW LABEL CATEGORIES ONLY	INDUSTRIAL OR TYPE A OR TYPE B
NA 9182 Special Form AM-BE 241	I	Special Form	3ci	1	II	.5	A

TRUCKING MONITORING (MR/HR)	CAB	FRONT SIDE	RIGHT SIDE	BACK SIDE	LEFT SIDE
BEFORE LEAVING SHOP (LOADED)					
BEFORE LEAVING JOB SITE (LOADED)					
AFTER UNLOADING AT THE SHOP					

CUSTOMER _____ WELL _____
 FIELD _____ COUNTY _____ STATE _____
 JOB TICKET NO. _____ DATE SURVEYED _____
 TYPE SURVEY METER _____ SERIAL NUMBER _____

SEALED SOURCES

TYPE SOURCE _____ NUMBER _____

CONDITION OF SOURCE: GOOD _____ NEEDS REPAIR _____

CONDITION OF SOURCE SHIELD: GOOD _____ NEEDS REPAIR _____

SURVEY READINGS	BEFORE LOG	AFTER LOG
NORMAL BACKGROUND		
STORAGE CONTAINER		
TOOL		
HANDLING TOOLS		
RIG FLOOR		

ON JOBS USING SEALED SOURCES ONLY, THE CONTAMINATION LEVEL IS CONSIDERED TO BE TWICE THE NORMAL BACKGROUND READING FOR THAT LOCATION. REFER TO SECTION E FOR DETAILED INSTRUCTIONS ON MAKING SURVEY. IF LEVELS ARE FOUND THAT INDICATE CONTAMINATION, THE EMERGENCY PROCEDURES REPORT MUST BE FILLED OUT.

RADIOLOGICAL SUPERVISOR _____

RADIOACTIVE STORAGE MONITORING FORM

Base Station: _____ Date _____

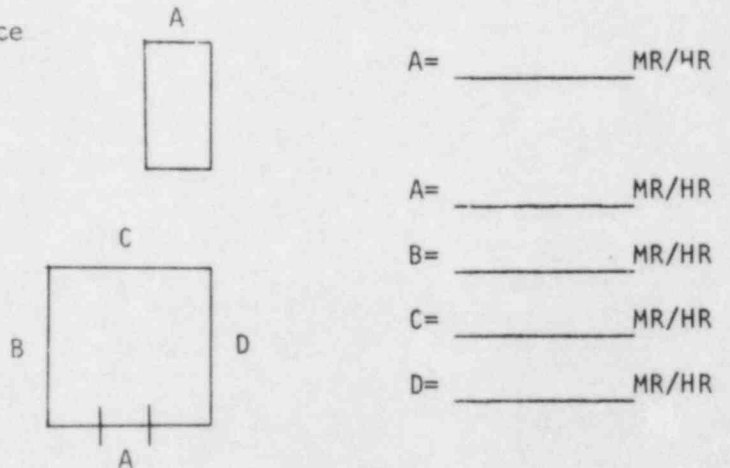
Department: _____

All radioactive material storage facilities either downhole, building or truck shall be monitored for radiation levels each month. This check should be made at the same time that inventory is made.

Type Survey Meter Used _____ Date Calibrated _____

Meter Serial Number _____ *Background _____ MR/HR
 *Normal background is recorded at least 30 feet from the storage facility.

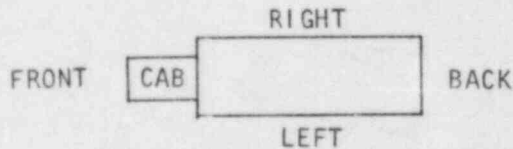
- Highest radiation level of the surface of downhole storage cover.
- Radiation level at the surface of storage building sides.



A= _____ MR/HR
 A= _____ MR/HR
 B= _____ MR/HR
 C= _____ MR/HR
 D= _____ MR/HR

Indicate position of source with X

- Monitor each truck with maximum load of radioactive material in place. After this is done, each truck is to be monitored with all radioactive material removed. Make sure to monitor the highest radiation level on each side of the trucks.



TRUCK NO.	SOURCES	CAB	FRONT SIDE	RIGHT SIDE	BACK SIDE	BACK SIDE
	LOADED					
	UNLOADED					
	LOADED					
	UNLOADED					
	LOADED					
	UNLOADED					
	LOADED					
	UNLOADED					

Radiological Supervisor _____

*NOTE:

DATE
Sept. 20, 1982

TELEPHONE OR VERBAL CONVERSATION RECORD

TIME 8:45 / 9:50 / 10:20 A.M. P.M.

INCOMING CALL

OUTGOING CALL

VISIT

PERSON CALLING

N. M. Shopenu

OFFICE/ADDRESS

U.S. N.R.C. Region IV
Arlington TX

PHONE NUMBER | EXTENSION

PERSON CALLED

Dwight Knoblet / Rell Schwab

Frank Peterson, legal Rep. (called)

OFFICE/ADDRESS

Well Logging, Inc. Nowa Ha, OK
Lic. #35-18229-01

Washington, DC

PHONE NUMBER | EXTENSION

(918) 273-0083

(202) 872-7661

CONVERSATION

SUBJECT

No Answer to violations in letter dated August 16, 1982

SUMMARY

Mr. Knoblet and Mr. Schwab were called twice during this date. A message was left stating the reason for the calls.

Mr. Frank Peterson called at 10:20 AM. He stated that he had just been contacted by Mr. Schwab to handle the matter. Mr. Peterson stated the reply to the notice of violation was dated and sent September 8, 1982.

REFERRED TO: D. Edwards -

ACTION REQUESTED Hold until response comes down the chain.

ADVISE ME OF ACTION TAKEN.

INITIALS

DATE

ACTION TAKEN

INITIALS

DATE