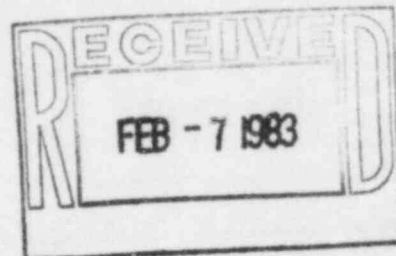


SATURN WIRELINE SERVICES INC.

(918) 885-2324 P.O. BOX 650 HOMINY, OKLA. 74035

January 25, 1983

United States
Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011



License: 35-19797-01

Mr. R. J. Everett
Chief
Materials Radiation Protection Section

Dear Sir:

In response to your letter of Oct. 25, 1982:

A 3 Curie Am:Be neutron source in storage in an unrestricted area at our facility was not secured from unauthorized removal. (Severity Level IV violation) (Supplement VI)

The corrective steps which have been taken and the results achieved.

Entry could be made into our facility through a rear door adjoining our facility with Ceja Oil Co., facility. Entry to the Ceja Oil Co. facility, however was denied by locked doors to the Ceja facility on the alley.

We immediately installed (Sept. 2, 1982) a 2-1/2" hasp and a high quality padlock to the door adjoining the facilities which if opened must be opened from our side of the facility, also the source container is secured to the wall of our facility with a 1/4" eye bolt and a 2 ft. section of 1/4" chain and locked in place by utilizing the hasp and lock on the storage container.

Storage of the source is no longer in the safe container, but in the downhole storage bunker, now that our downhole storage bunkers are complete.

We believe that full compliance is achieved.

2. Licensee shall make or cause to be made such surveys as may be necessary for the licensee to comply with the regulations in this part--
Specifically, no surveys or evaluation had been made incident to the transfer of two 2curie Cs-137 sources from unrestricted

areas outside our facility to the storage area.
(Severity Level IV violation) (Supplement IV)

The Corrective Steps which have been taken and the results achieved.

At the time of the inspection by Mr. Spitzberg we had to park one of the transporting units in our lot immediately outside the shop.

Shop has now been rearranged to a sufficient size to receive both transporting vehicles. The maximum distance that a source must be moved to the storage area from the transporting vehicle is now about 35-40 ft. inside our facility, even less if the vehicles are backed into our facility.

If it becomes necessary to leave one vehicle outside our facility in the parking lot, we have purchased a two wheel dolly for the transporting of the source of radioactivity and its DOT approved container to the storage area with no chance of any exposure to the general public.

We believe that full compliance is achieved.

3. Licensee must possess and use licensed material in accordance with statements, representations, and procedures contained in application dated June 4, 1981, and letters dated June 16, 1981, and April 15, 1982.

The procedures contained in the application dated June 4, 1981, and letter dated April 15, 1982, describe the instrumentation to be available and the routine surveys to be performed.

- (a) 1. On the date of the inspection only two of the required three survey instruments had been purchased by us and neither were available to perform surveys on April 23, 1982.

In late July 1982 we added a second truck, which at that time we should have purchased a third survey meter. The third meter has been purchased from G. E. Smith & Assoc. A G. E. Smith GS 500-A, exactly like our other two.

The meters were not available for surveys April 23, 1982 because they were sent to G. E. Smith & Assoc. for the purpose of calibration.

Mr Spitzberg informed us that we should not have both of them at the same time but staggered the calibration dates so we would have meters available for surveys at all times. This idea is instituted as our policy henceforth.

2. No routine well head surveys had been performed or documented.

We now use our "Monthly Vehicle and Job Site Survey," on each job that material of radioactivity is used.

These forms are also used in our routine monthly inspections of the transporting vehicles and storage facility.

We did not make the well head surveys for each job prior to the inspection by Mr. Spitzberg because we were under the

impression that it wasn't required by us unless the operation would be deemed abnormal by the engineer in charge. Our "Radiation Safety Procedures" Section 8 Par 2.4.

Mr. Spitzberg pointed out our error and the surveys are now being performed on each job where the use of radioactive materials is required.

3. No monthly vehicle surveys had been performed or documented.

The Surveys in question were misplaced by us during our move to our facility and rearranging of our files by our new secretary. They have since been found and copies can surely be made and sent to you if you so desire.

(b) Information relating to the dosimetry to be provided to the personnel.

According to the records we were able to produce on the day Mr. Spitzberg made his inspection, film badge service was not available for personnel from Aug. 26, 1981 to Nov. 1, 1981.

We were able to find and send to you a form letter from ICN welcoming us to their service and the film enclosures provided.

We took advantage of their 60 day trial offer and paid their invoice on Oct. 1, 1981 with our check No. 203.

As I explained to Mr. Spitzberg we simply would not operate without film badges, they are our only means of daily monitoring of the individual.

(c) Section 3 of the procedures contained in the application states that all Cs-137 sources will be kept locked in the storage facility unless actually in use.

Contrary to this requirement, from the time the license was issued, the sources had frequently been stored in the transportation vehicles when not in use.

To be as brief as possible, we had agreed to lease a building to be built, to our specifications, east of Hominy. It was to be ready June 1, 1981. We got our truck and some of our equipment June 20, 1981, the building still was not ready. Then by the latter part of Aug. 1981, we had all our equipment and our building wasn't even nearing completion! We had to do something. We made an agreement with Ceja Oil Co. on an old building they owned. Every other suitable building in town was occupied at the time. This facility required complete renovation, plus the construction of the storage facility. We felt that the safest place under the circumstances, for the sources, was chained and locked to the transporting vehicles.

Our downhole storage facility is now complete and being used effectively.

(d) April 5, 1982 is a diagram of our facility at 220 E. Main

Street, Hominy Okla.

An unlocked door was noted in the back of the work shop which did not appear on the diagram. This would have given free access to our neutron source from the adjoining facility which is not under our control.

The outside door of Ceja's shop which faces the alley is rarely opened, and remains locked the rest of the time.

We have a very congenial working arrangement with all of Ceja's employees and did not even consider the possibility of theft by any of them until Mr. Spitzberg brought it to our attention.

We fixed a lock to the slide door immediately (Sept 2, 1982) and affixed a mechanism to the wall of our shop area to secure the neutron source holder so it could not be removed by any unauthorized person.

Enclosed is a corrected diagram of our office, shop, workshop, and drafting shop.

We believe that full compliance is achieved.

4. In part, that each sealed source be tested for leakage at intervals not to exceed 6 months and each source received without a certificate of leak test not be put into service until tested.

Source CSV 933 had not been leak tested since received in July 1981. Sources NA 9182 (2 Ci Cs-137) SN CSV 358, and (3 Ci Am:Be 241) were not leak tested before entering service when they were received without a leak test certificate during June and July 1982, respectively.

We had failed to meet our obligation for the source CSV 933, through the overburden of trying to get a decent facility then making the facility decent that we now have.

Leak Tests were performed 10-4-82, on all of our sealed sources and due again 4-4-83, and will be regularly tested at intervals not to exceed 6 months.

Date of "Leak Tests Due" are posted over the downhole storage area so it won't be overlooked again.

The sources of radioactivity T-718 and CSV-358 were sent to us without certificates of leak tests, I talked to SIE, and Gulf Nuclear respectively, and they assured me the sources had been leak tested and the certificate would be forwarded to us immediately, we never received the certificates. Having been pressed for time to put the sources into service, due to the limited number of sources we had, we, naturally, did the most expedient thing, even though it was against our policy and our better judgement.

Sources have been leak tested and copies enclosed.

We believe we have our affairs well enough in hand now to be in full compliance with extant policies.

*} A Classic!
perhaps this is
his management
control statement.*

5. That we conduct a physical inventory every six months to account for all sealed sources possessed under the license.

We have conjugated this item with the previous item. Leak Tests. These can be performed at the same time with a minimum of effort. We have a form at Parker Printing, in Tulsa to expedite this deficiency. The forms should be back to us in about two weeks. As for the present, a physical inventory was performed and recorded 10-1-82, on a plain sheet of paper and filed at the time the leak tests were performed by us and sent to Gulf Nuclear for processing.

We will be in complete compliance 4-1-83 at the time the next physical inventory will be due.

6. (a) That type A special form radioactive material had been transported to field sites in transport containers which did not have documentation certifying them as DOT 7A containers.

Certification has been requested twice from Gulf Nuclear they assure us it will be here shortly, I am enclosing a copy of the second request.

- (b) Sealed source performance test records are being enclosed. Primary or initial performance test records are being requested from Gulf Nuclear.

As soon as these are received we feel we will be in complete compliance with these deficiencies.

Gentlemen:

We greatly appreciate your kind indulgence in bearing with us through our recent hardships, which were briefly discussed with Mr. Everett on the telephone. Be assured that our delinquency in replying was not due to lack of interest, we realize that we must have our sealed sources to conduct our business, and supply jobs, of which at this time there are precious few.

Respectfully yours,

O C LaMascus

O. C. LaMascus
President
Saturn Wireline Services, Inc.

OCL/dl
Encl

December 15, 1982

Gulf Nuclear, Inc.
202 Medical Center Blvd.
Webster, Texas 77598

Gentlemen:

We received on June 15, 1982 a 2 Ci Cs 137 source of radioactivity. It arrived without documentation certifying the container and without sealed source performance test records.

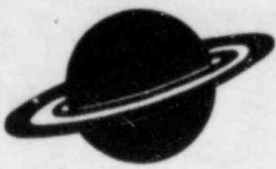
We need these documents as soon as possible to send copies to the NRC to fulfill our obligation on our deficiencies.

If further information is requested or required please feel free to call upon us at your earliest convenience.

AS Ever,

J. C. LaMascus
President
Saturn Wireline Services, Inc.

OCL/d1



SATURN WIRELINE SERVICES INC.

(918) 885-2324 P.O. BOX 650 HOMINY, OKLA. 74035

MONTHLY VEHICLE SURVEY AND JOB SITE SURVEY (DUAL PURPOSE FORM)

VEHICLE ID: _____

DATE: _____

MONTHLY _____ MR/HR

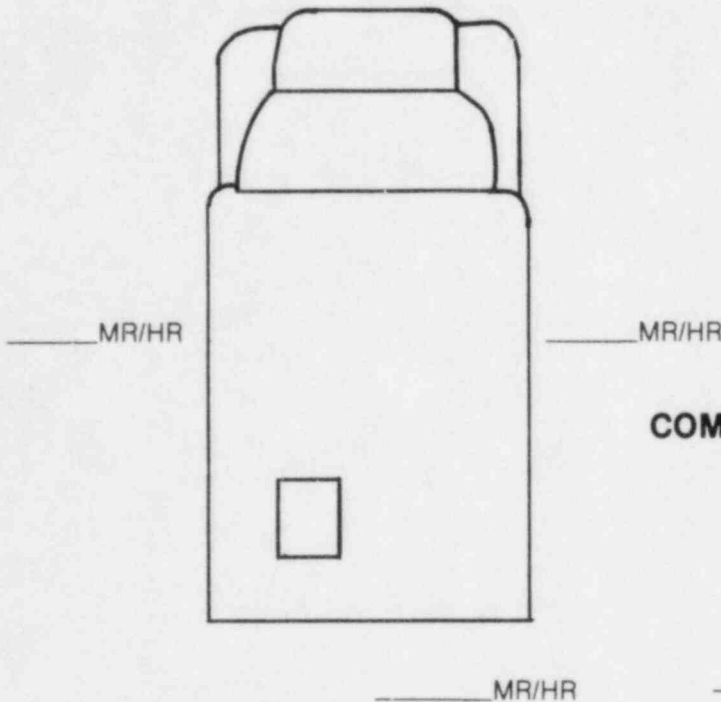
WELL IDENTIFICATION:

_____ Name _____ Number

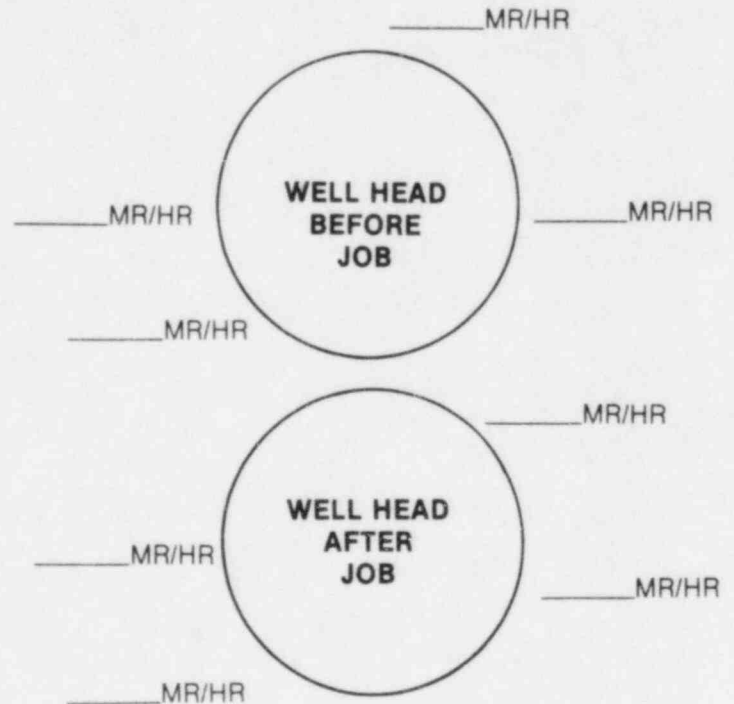
LOCATION: Field _____

County _____

State _____



COMPLETE FOR EVERY JOB USING RA MATERIAL



SURVEY METER IDENTIFICATION:

Model Number _____

Manufacturer _____

Serial Number _____

DATE: _____

INSPECTED BY:

_____ Signature



GULF NUCLEAR, INC.

100 NASA ROAD ONE SUITE 411 WEBSTER, TEXAS 77598 (713) 332-3581

CERTIFICATE OF LEAK TEST

CUSTOMER:

Saturn Wireline Services
P.O. Box 650
Hominy, OK 74035

SERIAL NO. OF SOURCE T718
ISOTOPE AmBe 241 QUANTITY 3 Ci
REMARKS _____
MANUFACTURER _____
TEST DATE 10/4/82

<u>TYPE OF TEST</u>		<u>RESULTS</u>	
<input checked="" type="checkbox"/>	KIT	GROSS COUNTS	<u>21</u>
<input type="checkbox"/>	VACUUM	BACKGROUND COUNTS	<u>40</u>
<input type="checkbox"/>	PRESSURE	EFFICIENCY <u>26.4%</u>	<u>dpm 0</u>

REMOVABLE CONTAMINATION Less than 1×10^{-4} MICROCURIES.

This is to certify that the leak test on the above source has been counted on the date specified and the results shown accurately represent the level of removable contamination at the time the test was performed.

NOTE: Removable contamination equal to or greater than 0.005 microcuries (11,000 dpm) constitutes a leaking source.

COUNTED BY CG APPROVED BY Frank Mark Jr.
DATE October 7, 1982 TITLE Radiation Protection Officer



GULF NUCLEAR, INC.

100 NASA ROAD ONE SUITE 411 WEBSTER, TEXAS 77598 (713) 332-3581

CERTIFICATE OF LEAK TEST

CUSTOMER:

Saturn Wireline Services
P.O. Box 650
Hominy, OK 74035

SERIAL NO. OF SOURCE CSV-358
ISOTOPE Cs-137 QUANTITY 2 Ci
REMARKS _____
MANUFACTURER _____
TEST DATE 10/4/82

<u>TYPE OF TEST</u>		<u>RESULTS</u>	
<input checked="" type="checkbox"/>	KIT	GROSS COUNTS	<u>124</u>
<input type="checkbox"/>	VACUUM	BACKGROUND COUNTS	<u>150</u>
<input type="checkbox"/>	PRESSURE	EFFICIENCY	<u>51%</u> dpm <u>0</u>

REMOVABLE CONTAMINATION Less than 1×10^{-4} MICROCURIES.

This is to certify that the leak test on the above source has been counted on the date specified and the results shown accurately represent the level of removable contamination at the time the test was performed.

NOTE: Removable contamination equal to or greater than 0.005 microcuries (11,000 dpm) constitutes a leaking source.

COUNTED BY CG APPROVED BY Frank Malle Jr.
DATE October 7, 1982 TITLE Radiation Protection Officer



GULF NUCLEAR, INC.

100 NASA ROAD ONE SUITE 411 WEBSTER, TEXAS 77598 (713) 332-3581

CERTIFICATE OF LEAK TEST

CUSTOMER: Saturn Wireline Services
P.O. Box 650
Hominy, OK 74035

SERIAL NO. OF SOURCE CSV-933
ISOTOPE Cs-137 QUANTITY 2 Ci
REMARKS _____
MANUFACTURER _____
TEST DATE 10/4/82

<u>TYPE OF TEST</u>		<u>RESULTS</u>	
<input checked="" type="checkbox"/>	KIT	GROSS COUNTS	<u>130</u>
<input type="checkbox"/>	VACUUM	BACKGROUND COUNTS	<u>150</u>
<input type="checkbox"/>	PRESSURE	EFFICIENCY <u>51%</u>	<u>dpm 0</u>

REMOVABLE CONTAMINATION Less than 1×10^{-4} MICROCURIES.

This is to certify that the leak test on the above source has been counted on the date specified and the results shown accurately represent the level of removable contamination at the time the test was performed.

NOTE: Removable contamination equal to or greater than 0.005 microcuries (11,000 dpm) constitutes a leaking source.

COUNTED BY CG APPROVED BY Frank Maleski Jr.
DATE October 7, 1982 TITLE Radiation Protection Officer



ICN Dosimetry Service

26201 Miles Road, Cleveland, Ohio 44128
Telephone: 216/831-3000

New Account Code No. 9956

Welcome to ICN and thank you for your order for our film badge service.

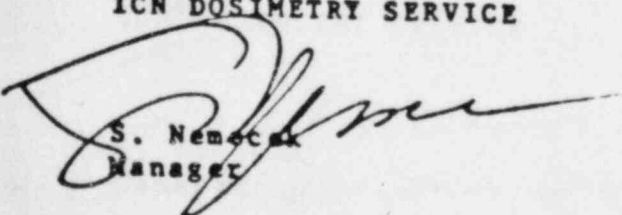
Your first two months film are enclosed along with an instruction manual and technical brochure. Please refer to them for proper use of our service.

Our prices for this service are moderate and based on a 12 month contract, automatically renewable. But, we are so sure you will find this service invaluable that we are extending a 60 day trial period. If you're not convinced it's giving you invaluable protection at a very low cost, just write cancel on your invoice and enclose the holders. Return it within the trial period.

Should you have any questions, our customer service dept. is always at your service. We look forward to serving you.

Sincerely,

ICN DOSIMETRY SERVICE


S. Nemec
Manager

- Enclosures: 1 INSTRUCTION MANUAL
1 TECHNICAL BROCHURE
2 PACKING LIST
1 SET FILM DATED 8/15
1 SET FILM DATED 8/15
1 SET HOLDERS

ICN ICN DOSIMETRY SERVICE
 26201 MILES ROAD
 CLEVELAND, OHIO 44128
 TELEPHONE: 216/831-3000

INVOICE NO.
DS 46048

PLEASE REFER TO
 THIS INVOICE NO.
 AND DATE IN ALL
 CORRESPONDENCE

SOLD TO:

Settern Wire Line Service
 P.O. Box 650
 Hominey, OK 74035

SHIP TO:

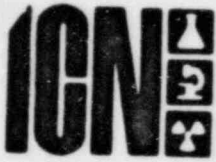
FORM CODE NO.	DATE OF INVOICE	FROM	THROUGH	P. O. NUMBER	REP. NO.
9956	9-18-81	10-1-81	9-30-82		KP

TYPE OF SERVICE	LENGTH OF SERVICE				CHARGES		
	WEEKLY	BI-WEEKLY	MONTHLY	QUARTERLY	NO. OF BADGES	UNIT PRICE	EXTENSION
CHARGES FOR CURRENT SERVICE							
BODY OR WRIST: GAMMA, X-RAY GAMMA, X-RAY, BETA TLD			12		3	2.45	88.20
RING: GAMMA, X-RAY TLD							
WALL MONITOR: GAMMA, X-RAY GAMMA, X-RAY, BETA							
SUB TOTAL							
ADJUSTMENT TO PREVIOUS PERIOD							
BADGE NO	FROM	TO					
SUB TOTAL							
SERVICE CHARGES							
ADDITIONS							
DELETIONS							
CHANGES							
SPECIAL HANDLING							
			SET UP		3	1.00	3.00
SUB TOTAL							
TOTAL AMOUNT DUE							91.20

pd. ck. # 203
 10-1-81

TERMS: PAYMENT DUE UPON RECEIPT. A LATE PAYMENT CHARGE OF 1 1/2 % PER MONTH (18% PER ANNUM) WILL BE ADDED TO YOUR ACCOUNT FOR ALL BILLS OVER DUE 30 DAYS OR MORE.

We hereby certify that these goods were produced in compliance with all applicable requirements of the Federal Radiation Control Act of 1958 and the regulations and orders of the U.S. Atomic Energy Commission.



ICN DOSIMETRY SERVICE
 26201 MILES ROAD
 CLEVELAND, OHIO 44128
 TELEPHONE: 216/831-3000
 800/321-6842

CUSTOMER ACCOUNT NO.	LOCATION NUMBER	PERSON	BADGE DATE
09956		6	10/01/81

Refer To This Number In All Correspondence

SHIP TO:
 SETTERN WIRE LINE SERVICE
 PO BOX 650
 HOMINEY OK 74035
 ATTN D C LLAMASCUS

IMPORTANT: DO NOT RETURN CHANGE REQUEST WITH YOUR DOSIMETERS. ENTER CHANGES ON THE REVERSE SIDE OF THIS FORM AND RETURN SEPARATELY.

CHANGES TO BE EFFECTIVE FOR YOUR NEXT WEAR DATE MUST REACH THE CLEVELAND FACILITY BY:

RETURN FILM USING THE ORIGINAL SHIPPING BAG, COVER OLD LABEL AND POSTMARKS AND ATTACH POSTAGE.

TYPE	BADGE NUMBER	WEARER'S IDENTIFICATION	TYPE	BADGE NUMBER	WEARER'S IDENTIFICATION
1	1	* LAMASCUS G	1	2	* LAMASCUS D C
1	3	* RATHBUN D			

USE CONTROL PROPERLY
 REFER TO INSTRUCTION MANUAL

ASSIGNED NUMBERS MUST ALWAYS
 BE WORN BY THE SAME INDIVIDUAL

BADGE HOLDERS THIS SHIPMENT

BADGE TOTAL THIS SHIPMENT

3

