



July 31, 2020

Nuclear Regulatory Commission

RE: Request temporary exemption 10CFR §39.71(a), License No. 42-00090-03, Docket 030-06388

This Letter is to request an expedited review of a temporary exemption for License No. 42-00090-03 issued to Schlumberger Technology Corporation (STC). STC is temporarily unable to comply with its own procedures and 10CFR §39.71(a) due to the global Covid-19 pandemic.

A positive Covid-19 test result has been identified on an offshore Gulf of Mexico rig, and as a result all non-essential personnel have been evacuated from the rig. At the time the positive result was identified, STC was providing Logging While Drilling (LWD) services which included two well-logging sources. The well-logging supervisor at the wellsite came into direct contact with the individual who tested positive and has been evacuated from the rig. The operator is reluctant to send additional personnel offshore for fear of spreading the virus. STC is, therefore, requesting an exemption to have a well-logging supervisor physically present at a temporary jobsite whenever licensed materials are being handled or are not stored and locked in a vehicle or storage place.

STC is seeking the exemption from July 30, 2021 to August 10, 2020. The operator and rig company estimates it will take 5 days to complete deep cleaning of the rig. Additionally, time will be required to mobilize a cleaning crew to the rig and, when complete, return personnel to the rig, and further delays could result from an unplanned weather event in the Gulf of Mexico.

The Bottom Hole Assembly (BHA) containing the LWD tools and two well-logging sources has been moved out of open hole and into the cased portion of the well. The operator has confirmed via email that the BHA and sources will remain in the well below 1000 ft MD until a qualified well-logging supervisor can be safely returned to the rig. The sources are secure in the sense that no person has access to them, and no personnel can be exposed to their radiation while they are in the well.

At present, the operator has agreed to allow an STC employee to remain on the rig. This person has classroom training in radiation safety, use of radioactive sources for well-logging and has demonstrated competence in the use of a survey meter. The STC employee has been instructed to monitor the well and rig activity and report immediately if the rig attempts to return the sources to surface.

It must be stressed that conditions on the rig may change rapidly. Therefore, STC is requesting that the exemption be granted without the requirement for an STC employee to remain onboard, with the understanding that every reasonable effort will be made to keep an STC employee aboard the rig.

Source details

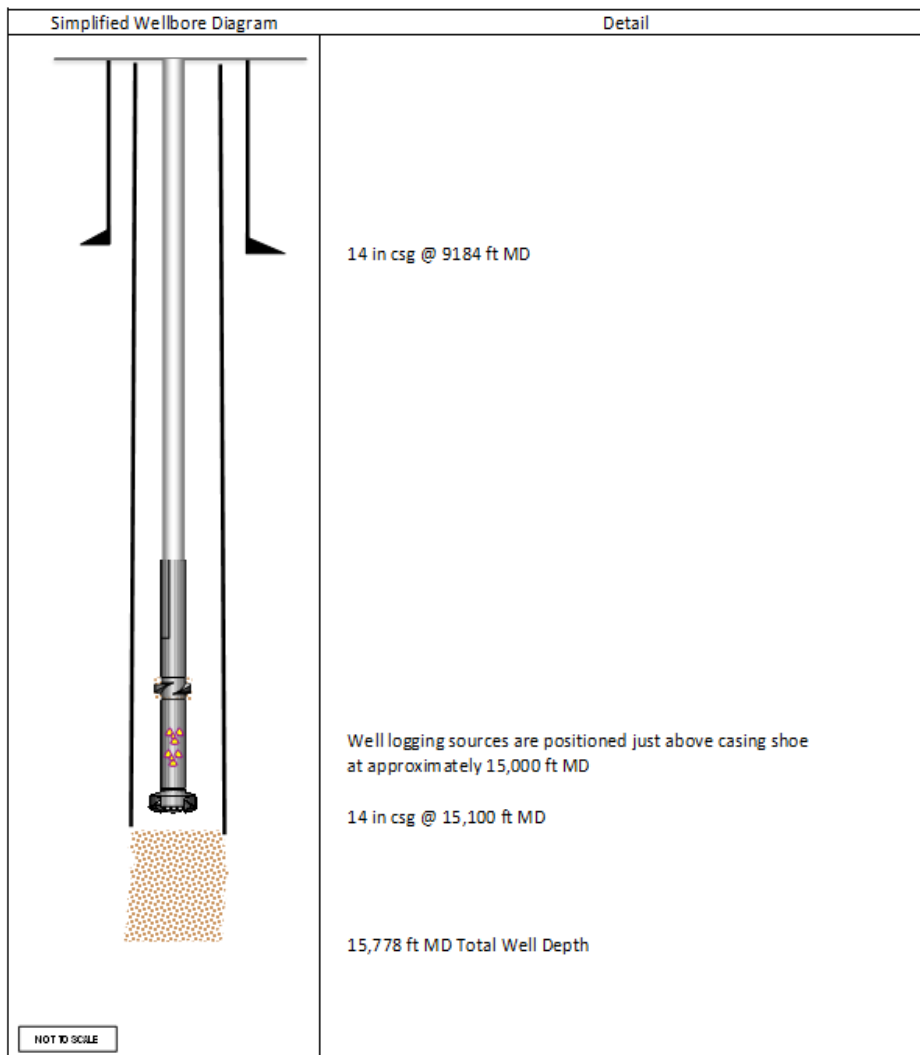
Source Identification	Isotope	Activity
GSRZ-A3229	Cs137	63 GBq (1.7 Ci)
NSRT-Q1124	Am241Be	278 GBq (7.5 Ci)

Location details

Field Name	Green Canyon 18
Well Name	GC 018 A23 ST01BP00
Coordinates	N 27° 56' 37.37079", W 91° 1' 45.17931"

**Schlumberger Technology Corporation (STC)
42-00090-03/030-06388
X Publicly Available Normal Release
July 31, 2020
LHanson**

Simplified wellbore diagram



If you have any questions or require additional information, please contact me at 281-285-8775 or deible1@slb.com.

Sincerely,

Charles Deible
Radiation Safety Officer
Schlumberger Technology Corporation

Hanson, Latischa

From: Chuck Deible <deible1@slb.com>
Sent: Friday, July 31, 2020 6:53 AM
To: Hanson, Latischa
Cc: Gepford, Heather; VonEhr, Jason; Catherine Nutt
Subject: [External_Sender] Schlumberger COVID-19 Exemption Request for Additional Information in response to the verbal 7/30/2020correspondence
Attachments: Exemption_request.pdf

Hello Latischa,

Please find attached the exemption request for license 42-00090-03, Docket 030-06388.

Rgds,
Chuck

Charles Deible
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Schlumberger-Private

From: Hanson, Latischa <Latischa.Hanson@nrc.gov>
Sent: Thursday, July 30, 2020 3:04 PM
To: Chuck Deible <deible1@slb.com>
Cc: Gepford, Heather <Heather.Gepford@nrc.gov>; VonEhr, Jason <Jason.VonEhr@nrc.gov>
Subject: [Ext] Schlumberger COVID-19 Exemption Request for Additional Information in response to the verbal 7/30/2020correspondence
Importance: High

Please send the requested information to:

Heather Gepford, Chief, Materials Licensing & Decommissioning Branch (MLBD) Heather.Gepford@nrc.gov
Jason VonEhr, Materials Inspector, Materials Inspection Branch Jason.VonEhr@nrc.gov
Latischa Hanson, Licensing Latischa.Hanson@nrc.gov

Thanks for taking our call today. If you have any additional questions, feel free to contact us.

Latischa



Latischa Hanson, M.Sc., Health Physicist
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