



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

August 4, 2020

Charles Deible
Radiation Safety Officer
Schlumberger Technology Corporation
300 Schlumberger Dr, MD-121
Houston, TX 77478

SUBJECT: TEMPORARY EXEMPTION FROM U.S. NUCLEAR REGULATORY
COMMISSION REGULATION, TITLE 10 *CODE OF FEDERAL REGULATIONS*,
SECTION 39.71(a)

Dear Mr. Deible:

By email dated July 31, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession ML20213B790), in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 30.11(a), Schlumberger Technology Corporation (STC), who holds a specific license issued in accordance with 10 CFR Part 39, requested an exemption from the requirements listed in 10 CFR 39.71(a). The Nuclear Regulatory Commission (NRC) verbally approved this request during a telephone call on July 31, 2020 (ADAMS Accession ML20216A507).

In its exemption request, STC stated that due to a positive Covid-19 test result identified on an offshore Gulf of Mexico rig, all non-essential personnel were evacuated from the rig. At the time the positive result was identified, STC was providing logging-while-drilling services, which included two well-logging sources. The well-logging supervisor at the well site came into direct contact with the individual who tested positive and has been evacuated from the rig.

Additionally, the rig operator is reluctant to send additional personnel offshore for fear of spreading the virus. Schlumberger Technology Corporation is, therefore, requesting an exemption to the regulatory requirement of 10 CFR 39.71(a), to have a well-logging supervisor physically present at a temporary job site whenever licensed materials are being handled or are not stored and locked in a vehicle or storage place. The licensee requested relief from 10 CFR 39.71(a) for a time period of July 30 to August 10, 2020, to allow non-essential personnel, including the affected well-logging supervisor, to be evacuated and a deep-cleaning crew be mobilized to the rig.

The exemption provision in 10 CFR 30.11(a) states:

The Commission may, upon application of any interested person or upon its own initiative, grant exemptions from the requirements of the regulations in this part and Parts 31 through 36 and 39 of this chapter as it determines are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest.

The NRC staff reviewed the request in accordance with 10 CFR 30.11(a) and finds that the criteria contained therein are met. The regulation for which STC is requesting an exemption is 10 CFR 39.71(a), which requires a logging supervisor to be physically present at a temporary jobsite whenever licensed materials are being handled or are not stored and locked in a vehicle or storage place. The licensee requested relief from 10 CFR 39.71(a) to accommodate the evacuation of personnel for deep-cleaning of the rig following a positive COVID-19 test result.

Regulations in 10 CFR 30.11(a) authorizes granting of exemptions specific to Part 39. The NRC staff has determined that the granting of the requested exemption will not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. The NRC staff, therefore, finds that the granting of the requested exemption is authorized by law.

The NRC staff has determined that this exemption is appropriate because the bottom hole assembly containing the logging-while-drilling 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 that the bottom hole assembly and sources will remain in the well below 1000 feet measured depth 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. The NRC also notes that, absent the requested exemption, the licensee may be required to take actions that may be contrary to guidance on preventing the spread of the virus that causes COVID-19. Therefore, the NRC staff finds that the requested exemption will not endanger life or property or the common defense and security and is otherwise in the public interest.

Based on the above findings, the NRC grants the following exemption for the specified period of time:

From July 31 until August 10, 2020, the licensee is temporarily exempt from the requirement in 10 CFR 39.71(a) that a logging supervisor must be physically present at a temporary jobsite whenever licensed materials are being handled or are not stored and locked in a vehicle or storage place. Specifically, a logging supervisor is not required to be physically present when licensed material located in the Green Canyon 18 well field is not stored and locked in a vehicle or storage place provided that:

- The bottom hole assembly containing the logging-while-drilling tools and two well-logging sources remains in the cased portion of the well at approximately 1000 feet measured depth,
- The well and rig activity are monitored and if the rig attempts to return the sources to the surface it is immediately reported to STC personnel, and
- Every reasonable effort is made to keep an STC employee who has received classroom training in radiation safety principles related to well logging and has demonstrated an ability to operate a survey instrument on board the rig. The exception to this would be a situation threatening the health and safety of all individuals on the rig warranting evacuation of all personnel, e.g., unplanned weather events in the Gulf of Mexico.

An environmental assessment for this action is not required, because this action is categorically excluded under 10 CFR 51.22(c)(25)(vi)(F). In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice," a copy of this letter and its enclosure will be available electronically

for public inspection in the NRC Public Document Room or from the NRC's ADAMS, accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

If you have questions, please contact Latischa M. Hanson at Latischa.Hanson@nrc.gov or 817-200-1286.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather J. Gepford". The signature is fluid and cursive, with a large loop at the end.

Heather J. Gepford, Ph.D., CHP, Chief
Materials Licensing & Decommissioning Branch
Division of Nuclear Materials Safety

Docket: 030-06388
License: 42-00090-03

TEMPORARY EXEMPTION FROM U.S. NUCLEAR REGULATORY COMMISSION
 REGULATION, TITLE 10 *CODE OF FEDERAL REGULATIONS* (10 CFR) 39.71(a) DATED –
 August 4, 2020

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