

OCT 19 1987

Docket: 30-19037  
License: 42-19649-01

USNRC-DS  
1987 OCT 22 A 10:04

BJ-Titan Service  
P. O. Box 4442  
Houston, Texas 77210

Gentlemen:

SUBJECT: RADIATION SAFETY PROGRAM CONCERNS IN THE WELL LOGGING INDUSTRY

In recent months Region IV inspectors have found an increasing number of well logging licensees to be in serious noncompliance with the requirements of their license. There is some evidence that the problems may result from the depressed economy of the oil industry. Such evidence includes employee layoffs, personnel training deficiencies, implementation of cost-saving measures related to radiation safety, repossession of assets, and bankruptcy. Frequently there has been serious management breakdown in the conduct of licensed activities.

Violations have included unauthorized or improperly trained personnel conducting licensed activities, failure to amend NRC licenses to reflect changes in the organization or program, failure to perform or maintain records of routine radiation safety requirements, and not being truthful about licensed activities. Because of such problems, the NRC has had to take significant enforcement action to protect the health and safety of the public.

The purpose of this letter is to reemphasize your responsibility to conduct licensed activities according to license requirements at all times. If economic conditions or other factors affect your ability to meet any requirements of your license, please contact this NRC office for guidance, license amendment, or license termination, if necessary. Failure to do so can result in severe penalties.

After you read this letter, we recommend that you review your NRC license, commitments made to NRC during the licensing process (to follow operating and emergency procedures, for example), and applicable NRC regulations to ensure that your radiation safety program continues to protect the health and safety of your workers and the public. You previously have been notified of the new 10 CFR Part 39, License and Radiation Safety Requirements for Well logging Operations, which is applicable to your activities involving the use of radioactive material. A copy is enclosed for your use.

RIV:NMIS *WJ*  
DBSpitzberg;ap  
10/15/87

C:NMIS *WJ*  
RJEverett  
10/15/87

C:NMEPB *WJ*  
WLFisher  
10/15/87

D:DRSS *WJ*  
RLBangart  
10/16/87

RA  
RAMartin  
1/87

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NRC is continuing to search for ways to emphasize the importance and necessity for licensees to implement effective radiation safety programs. The new 10 CFR Part 39 and changes to the NRC inspection program that are currently under evaluation are examples of these efforts. One-day workshops or seminars held at convenient location(s) for the benefit of well logging licensees and the NRC are also being considered to explain current NRC programs. Licensees would be provided opportunities to participate and to provide the NRC comments on matters of interest. Your views would aid us in deciding whether to conduct such workshops.

We invite you to write or call us expressing your views on the potential benefits of workshops and whether you would be willing to participate actively- for example, as a panel member.

Please contact Mr. R. J. Everett of this NRC office at (817) 860-8187 to express your interest in the workshop or to receive answers to any questions that you may have.

Sincerely,

Original signed by

Robert D. Martin

Robert D. Martin

Regional Administrator

Enclosure:

10 CFR Part 39, Licenses and  
Radiation Safety Requirements  
for Well-Logging Operation

cc w/o enclosure:

Texas Radiation Control Program Director

bcc w/o enclosure:

OMB - Original (M006)

RD Martin

RL Bangart

WL Fisher

D Weiss, RM/ALF (AR-2015)

DB Spitzberg

NMEPB

RIV File