In Reply Refer To: License: 42-00090-03 Docket: 30-06388/88-01

Schlumberger Technology Corporation Schlumberger Limited ATTN: C. E. Racster Radiation Safety Officer 5000 Gulf Freeway P.O. Box 2175 Houston, Texas 77001

Gentlemen:

Thank you for your letter of February 2, 1989, in response to our letter and attached Notice of Violation both dated December 21, 1988. As a result of our review, we find additional information, as discussed with Mr. C. E. Racster during a telephone call on March 13, 1989, is needed. Specifically, your response states that you will maintain all records of personnel training in the employee's personnel file kept in the unit office and that copies of the records can be sent to the field offices during an inspection by telecopy. With regard to this commitment we refer you to 10 CFR 39.73(i) which requires that such training records be maintained at the field station. We would require compliance with this regulation except in those cases where an exemption has been authorized pursuant to 10 CFR 39.91. Therefore, please describe the actions you will take to ensure compliance with 10 CFR 39.73(i) in the future and the date when full compliance will be in effect.

Please provide the supplemental information within 10 days of your receipt of this letter so that we can continue our review of this matter.

Original Signed By: William L. Fisher

William L. Fisher, Chief Nuclear Materials Safety Branch

cc: Texas Radiation Control Program Director

bcc w/copy of licensee letter: DMB - Original (IE-07) RLBangart WLFisher CLCain DBSpitzberg MIS System RSTS Operator

RIV:NMIS 7055 DBSpitzberg:ch 3/14/89 C:NMIS DR DAPowers 3/14/89 RDMartin REHall LShea, RM/ALF (AR-2015) DAPowers NMSB RIV Files (2)

C:NMSB WHJ WLFisher 3/15/89

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SCHLUMBERGER WELL SERVICES 5000 GULF FREEWAY, P.O. BOX 2175 HOUSTON, TEXAS 77001, (713) 928-4000

FEB - 7 1989

February 2, 1989

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

Gentlemen:

Reference:

our License 42-00090-03 Docket 30-06388/8801

and your letter dated Dec. 21, 1988

Your letter was received January 20, 1989 in an envelope marked "Found loose in the mail, Fort Worth, TX 76161" and with a postmark of January 16, 1989.

By telephone, Blair Spitzberg extended the due date for response to February 20, 1989.

In response to your letter of December 21, 1988, and attached notice of violation:

We agree that our records do not include records of training for all logging supervisors and logging assistants at Casper. We agree that the records of annual review at Casper does not include a listing of topics discussed.

It is likely that the loss or incompleteness of records noted at Casper does, in fact, exist at some other field offices.

It is our intention that all records of training and annual review will be kept with the employee's permanent personnel file. That file is kept in the Unit office, not in the Field office. These Unit offices are located in New Orleans, Dallas, and Calgary, Alberta, Canada (for the Alaska field offices). A copy of the records can be sent to the Field offices during an inspection by FAX (telecopy).

The reason (but not excuse) for the missing incomplete records is lack of emphasis and auditing.

We have underway (the planning began in June 1988) a training program for all existing logging supervisors and logging assistants as well as new employees entering these classifications. The actual training will commence in early February 1989, and we expect to be more than 90% complete by July 1989 (100% by year end). With this training, we will have new records of training for all affected employees.

These new records of training will be kept with the permanent personnel file as described above.

We will also establish a record for future annual reviews that specify the topics reviewed. This will be also a part of the permanent personnel file for logging supervisor and logging assistants.

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Additionally, we plan (but have not yet implemented) a personnel computer program which will track training and annual review for the logging supervisors and assistants.

Finally, we will establish a procedure so that once a year the permanent personnel file for logging supervisors and assistants is physically checked to assure that the records of training and annual reviews are present.

We expect that the annual check of records and the personnel computer program will be functional by mid year.

I apologize for the record keeping discrepancies found by your inspector. I am convinced that an inspection later this year will show the results of our efforts.

Sincerely,

C. E. Racster

Radiation Safety Officer

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