



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

January 31, 2022

EA-21-131

Mr. Charles Deible  
Radiation Safety Officer  
Schlumberger Technology Corporation  
300 Schlumberger Drive, MD-121  
Sugar Land, TX 77478

SUBJECT: SCHLUMBERGER TECHNOLOGY CORPORATION 030-06388, EXERCISE OF  
ENFORCEMENT DISCRETION

Dear Mr. Deible:

In an email and letter dated August 26, 2021, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21239A146, not publicly available), you notified the U.S. Nuclear Regulatory Commission (NRC) that an approaching storm, Hurricane Ida, necessitated the evacuation of non-essential personnel from an offshore rig in the Gulf of Mexico. The evacuation included a well-logging supervisor while two well-logging sources remained in the well and not in storage. The NRC acknowledged your communication in a letter dated August 27, 2021, ADAMS Accession No. ML21239A420.

As a result of the well-logging supervisor evacuation, Schlumberger Technology Corporation, who holds a specific license issued in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 39, was unable to comply with the requirements in 10 CFR 39.71(a). Title 10 CFR 39.71(a) requires, in part, 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. Contrary to the above, from August 27 to September 22, 2021, a well-logging supervisor was not physically present at a temporary jobsite, an offshore rig in the Gulf of Mexico, when licensed material (two well-logging sources) was not stored and locked in a vehicle or storage place.

The NRC evaluated the significance of the violation of 10 CFR 39.71(a). This violation is normally characterized as a Severity Level III violation in accordance with Section 6.7.c.10.a of the NRC Enforcement Policy. The NRC Enforcement Policy can be found on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

As a result of its evaluation, the NRC determined that the violation of 10 CFR 39.71(a) described above resulted from matters not entirely within your control. You acted in good faith in a timely manner to inform the NRC and request an exemption prior to the violation occurring. The cause for the violation was the need for timely action to ensure personnel safety due to the approach of severe weather. You implemented appropriate compensatory actions. No personnel exposure or loss of material occurred during the period of non-compliance.

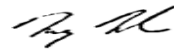
Compliance was restored as soon as safe access to the rig was accomplished. Based on these facts, I have been authorized, in consultation with the Director, Office of Enforcement, to exercise enforcement discretion in accordance with Section 3.5, "Violations Involving Special Circumstances," of the NRC Enforcement Policy and refrain from issuing an enforcement action for the violation of 10 CFR 39.71(a).

No further action or response is required on your part unless the description in this letter does not accurately reflect the facts, your actions, or your situation. In that case, or if you choose to respond, clearly mark your response as a "Reply to an Exercise of Enforcement Discretion, EA-21-131," and send it to the Director, Division of Nuclear Materials Safety, U.S. Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd., Arlington, Texas 76011-4511, and email it to [R4Enforcement@nrc.gov](mailto:R4Enforcement@nrc.gov) within 30 days of the date of this letter.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's ADAMS, accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the public without redaction.

Should you have any questions regarding this matter, please contact Mr. Roberto Torres, Chief, Materials Licensing and Decommissioning Branch, at 817-200-1189.

Sincerely,



Signed by Muessle, Mary  
on 01/31/22

Mary C. Muessle, Director  
Division of Nuclear Materials Safety

Docket No: 030-06388  
License No: 42-00090-03

SCHLUMBERGER TECHNOLOGY CORPORATION 030-06388, EXERCISE OF ENFORCEMENT DISCRETION - DATED JANUARY 31, 2022

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