



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 18, 2022

Mr. David W. Tinker
Radiation Safety Officer
ProTechnics Division of Core Laboratories LP
6510 West Sam Houston Parkway North
Houston, TX 77041

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING PROTECHNICS
APPLICATION FOR EXEMPTION LETTER DATED AUGUST 22, 2022

Dear Mr. Tinker:

This letter refers to your application dated August 22, 2022, Agencywide Documents Access and Management System (ADAMS) accession number ML22236A029. In reviewing your request, we found that additional information is required to complete our review.

Your request to authorize an alternate abandonment procedure is regulated under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 39 "Licenses and Radiation Safety Requirements for Well Logging". These regulations require the applicant to submit sufficient information regarding the application for exemption, please submit the following information:

1. Provide the diameter at the top of the well opening at subsea floor.
2. Provide supporting discussion for the statement that "*the well bore deviation significantly reduces the risk of damage to ProTechnics stuck logging tool containing the sealed source.*"
3. Provide an explanation why the cement plug would prevent the well from being used in the future.
4. Provide the length of time that the source would be in an "alternate" abandonment status.
5. Please describe the analysis and evaluation performed by ProTechnics to determine that the HEG-137 model sealed source will not exceed its ANSI classification of 77C66535 and will maintain its integrity while stuck for a prolonged period of time at 15,512 feet below the surface.
6. Provide a detailed explanation (reasons) of why ProTechnics is unable to implement the agreement with the well owner as specified in and required by 10 CFR Paragraph 39.15(a)(5)(i) to immobilize the source and seal it in place with a cement plug.

In accordance with 10 CFR Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC's) "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

To continue review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

If you have any questions, you may contact me at (301) 415-3257, or by electronic mail at Michelle.Hammond@nrc.gov.

Sincerely,

Michelle M. Hammond
Digitally signed by
Michelle M. Hammond
Date: 2022.10.18
13:17:43 -05'00'

Michelle M. Hammond, M.Sc.
Materials Safety and Tribal Liaison Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Materials Safety
and Safeguards

License No. 42-26928-01
Docket No. 030-30429
Mail Control No. 632231

D. Tinker

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SUBJECT: PROTECHNICS REQUEST FOR ADDITIONAL INFORMATION CONCERNING
APPLICATION FOR EXEMPTION LETTER DATED AUGUST 22, 2022

DATE: OCTOBER 18, 2022

ADAMS Accession Number: ML22285A192

OFFICE	MSST/MSTB	MSST/MSTB	REFS/ERMB	OGC	MSST/MSTB
NAME	MHammond	TBrockington	JPark	JMcManus	MHammond
DATE	10/07/2022	10/12/2022	10/07/2022	NLO-10/11/2022	10/18/2022

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