



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 E. LAMAR BLVD
ARLINGTON TX 76011-4511

January 23, 2023

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, NRC LICENSE NO. 42-26928-01

The Nuclear Regulatory Commission (NRC) has received your letter dated November 2, 2022, requesting authorization to discharge well completion fluids containing short-lived radioactive tracers in offshore waters in the U.S. Outer Continental Shelf of the Gulf of Mexico, and additional information is needed.

Your November 2, 2022, letter did not state the concentration range (average concentration goal and upper concentration limit not to be exceeded) that ProTechnics wants to be authorized to use in NRC license number 42-26928-01 for discharge of well completion fluids. In addition, ProTechnics did not provide the NRC with procedures for taking and measuring effluent samples, procedures for ensuring that the upper concentration limit is not exceeded, and procedure describing the methodology for sampling or calculating effluent concentrations. What ProTechnics needs to submit to the NRC is an enforceable upper concentration limit with associated operational procedures for the discharge of well completion fluids. In order for ProTechnics to meet the requirements of 10 CFR 20.2002, submit procedures that contain the following information.

1. Submit your proposed procedure for discharge at sea of well completion fluids containing licensed radioactive tracer material (Iridium-192 and Scandium-46) into offshore waters in the U.S. Outer Continental Shelf in the Gulf of Mexico, an area of exclusive Federal jurisdiction. State the average concentration goal and upper concentration limit that ProTechnics wants to be authorized in NRC license number 42-26928-01 for the discharge of well completion fluids. The procedure should ensure that the proposed upper concentration limit is not exceeded and that the average concentration goal is consistently met.
2. Submit your proposed procedure to ensure that non-occupational workers in offshore oil and gas platforms in the Gulf of Mexico are not exposed to 2 millirem in any one hour and 100 millirem in a year during discharge of effluents.
 - A. The procedure should include when radiation area boundaries are going to be established, how the licensee staff is going to accurately set the radiation boundaries before the discharge starts since the radiation field is not yet present, and how different pipe sizes, flow rates or other factors may affect radiation field estimates.

3. Submit your procedure that describes the methodology that ProTechnics proposes to use to measure or sample effluents to verify that the proposed upper concentration limit is not exceeded and that the average concentration goal is consistently met.

To continue review of your license amendment request, 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. Please contact me at 817-200-1189 if you have questions or require clarification on any of the information stated above.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Thank you for your cooperation.

Sincerely,

Roberto J. Torres, M.S., Senior Health Physicist
Materials Licensing Branch

Docket: 030-30429
License: 42-26928-01
Control: 633575