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**Subject:** NRC request for additional information  
**Date:** Wednesday, September 4, 2024 7:03:00 PM

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Michael Plaisance, RSO:

The NRC has completed the technical review of the license renewal application for NRC license number 17-35167-01 and additional information is needed as described below. Please provide a response by reply email in a signed and dated letter in company letterhead within 30 days of receipt of this email.

- ☐☐☐ Provide documentation demonstrating that the radiation safety officer has independent authority to stop unsafe operations.
  
- ☐☐☐ Parts of the renewal application state that the test passing grade for well logging supervisors and well logging assistants is 70% while another part of the application states that the test passing grade is 80%. Indicate correct passing grade and commit to update your procedures to indicate the correct passing grade.
  
- ☐☐☐ Submit procedure describing the conduct of the annual job performance audit [annual performance evaluation] of well logging supervisors (10 CFR 39.13(d)) to include:
  - A. Description of the program
  - B. Discussion of management actions based on audit results
  - C. Commitment to inspect each logging supervisor at intervals not to exceed 1 year
  - D. Commitment that inspections/audits are made on-the-job and unannounced
  
- ☐☐☐ Submit copy of the agreement between the licensee and the client for unsealed material to include:
  - ☐☐☐ Elements of the Agreement
  - ☐☐☐ Immediately contact well owner or operator if there are well returns after a tracer study has been performed
  - ☐☐☐ Implement operating and emergency procedures for dealing with sandouts and well returns (provide copy of this procedure)
  - ☐☐☐ Conduct radiation monitoring as required by 10 CFR 39.69(a)
  - ☐☐☐ Decontaminate environment, equipment, or personnel before releasing site or before releasing for unrestricted use
  - ☐☐☐ Implement approved procedures for disposal of sandout and well returns material
  
- ☐☐☐ Submit operating and emergency procedure that provides instructions for handling and using licensed materials, including sealed sources and unsealed material, in wells without surface casing for protecting fresh water aquifers.
  
- ☐☐☐ Submit procedures for identifying and reporting to the NRC defects and

noncompliance as required by 10 CFR 21.21(a).

Appendix A, Example of Cemented Sources, is referenced in the renewal application but was not submitted. Submit Appendix A.

Provide leak testing vendor(s) name, address, and Agreement State or NRC License Number.

Confirm that the licensee performs well logging operations only in wells for which surface casing has already been installed. If the licensee performs well logging operations in wells without surface casing, then provide procedures to include the following:

Obtain specific knowledge of the borehole conditions from the drilling team or company

Run a caliper log to show the hole is open or to find problem areas

Run a tool without a radioactive source to show it can be freely removed

Place a temporary casing in sections of the hole causing problems

Thank you for your assistance on this matter.

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