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October 10, 2024

Mr. Peter Habighorst, Chief
Export Controls and Nonproliferation Branch
Office of International Programs
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Re: Voluntary Self-Disclosure

Dear Mr. Habighorst:

As counsel to Schlumberger Technology Corporation (“STC”), we are filing this voluntary self-disclosure to provide the Nuclear Regulatory Commission (“NRC”) with information regarding one instance, in 2023, of an import of Category 2 radioactive material generally licensed under 10 CFR § 110.27 that should have required advance notification to the NRC under 10 CFR § 110.50.

This notice contains a description of the relevant background and facts, as determined by the results of STC’s review, a description of STC’s export compliance program, and a list of further corrective actions that will be taken to mitigate the risks of such potential violations occurring in the future.

I. Background and Facts

A. About STC

STC is a corporation organized under the laws of the State of Texas with headquarters in Houston, Texas. STC is an oilfield services and equipment company and a leader in digital solutions for subsurface and surface engineering. As part of its oilfield services work, STC utilizes radioactive materials in sealed sources and imports and exports those sealed sources.

B. Discovery of Issue

In mid-September 2024, as part of a regular review, the Radiation Safety Officer (RSO) at an STC facility in Colombia requested disposition certificates for sources returned from Colombia to the U.S. in May 2023. In the course of preparing these documents, on September 10, STC identified that six radioactive sources were combined into one shipment, aggregating into a Category 2 amount of material, and were imported into the United States (without any advanced notice to the NRC) on May 30, 2023.

The six radioactive sources in the May 2023 shipment included:

- 3 Neutron Sources for Well Logging (Model NSR-M; Radioisotope Am-241Be):
 - 555 GBq
 - 444 GBq
 - 444 GBq
- 3 Gamma Sources for Well Logging (Model GSR-Z; Radioisotope Cs-137):
 - 63 GBq
 - 63 GBq
 - 63 GBq

Prior to 2023, STC provided guidance specific to the import of radioactive material into the US in a radioactive material import checklist included in its overall training, “NRC Import and Export Regulations 10 CFR Part 110,” last provided to relevant STC staff in November 2021. The reason for this approach was that STC doesn’t normally import quantities of radioactive material that reach Category 2. However, in February 2023, STC took the action to formalize this guidance checklist into a procedure, resulting in the implementation of Version 1 of that procedure. Then, within the same month, STC issued Version 2 of this specific procedure for the

import of radioactive material into the US. Both versions of the procedure clearly stated that an import of this activity level would require advance notice to the NRC and suggested contact with the U.S. RSO.

At the time of procedure development, the May 2023 import was already in the STC process for evaluating radioactive sources sent to the U.S. Because the import was in process while the procedure was implemented, it appears that STC employees may have been confused about the process for this particular import and failed to note the NRC notification requirements or seek guidance from the U.S. RSO, inconsistent with the company procedure. STC employees working on imports seemingly did not notice the advance notification requirement set forth in the procedure and relied on a local RSO approval from January 2023, depriving the U.S. RSO of a chance to further identify NRC advance notification requirements.

This was an isolated incident. The company has reviewed all air waybills for imports into the United States since 2020 and only identified this one instance of a Category 2 import without any notification.

II. Immediate and Near Term Corrective Actions

STC has taken the following immediate corrective actions to address this issue:

- Reviewed records dating back to 2020 to confirm that there are no other Category 2 imports without any NRC notification.
- Consolidated communications by the U.S. RSO into a single point of contact (i.e. a single email address) to avoid internal confusion.

STC will also take the following corrective actions going forward to prevent recurrence:

- Updating the import procedure and rolling it out with training, expected this month (October 2024). This updated procedure references the consolidated email address for the U.S. RSO and clearly requires U.S. RSO approval for all radioactive material imports.
- Including this event as a lesson learned in STC's annual safety review compliance training, expected in November. All STC employees are required to view this training video.

III. Next Steps

STC is highly committed to ensuring compliance with nuclear import and export controls and is taking comprehensive actions to further ensure compliance with its program. STC would be pleased to meet with your office to discuss this disclosure

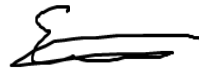
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and answer any questions, as well as provide any additional information that would help the NRC to evaluate the information in this disclosure.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anne Leidich'.

Anne Leidich
Counsel to STC

A handwritten signature in black ink, appearing to read 'Elina Teplinsky'.

Elina Teplinsky
Counsel to STC