

DOCKET NUMBER
PROPOSED RULE20,32 + 150
(70FR 43646)

(32)

From: "Simpkin, Philip" <phil.simpkin@bakerhughes.com>
To: <mlh1@nrc.gov>
Date: Thu, Oct 20, 2005 1:39 PM
Subject: National Source Tracking Proposed Rules Meeting 10-20-05

DOCKETED
USNRC

October 25, 2005 (10:35am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Ms Horn,

I attended the public meeting in Houston on September 20th and would like to make a few comments as requested, I appreciate that these are late and may no longer be required, but I have been travelling.

1) Reporting use at temporary jobsites

I believe this would be a major problem for the people "in the field" Baker Hughes works on drilling rigs supplying bore-hole logging services both wire line and logging while drilling. Some of these jobs are short term so in a 24 hour period the Engineers could be on one, two or very occasionally 3 locations. To get the Engineers to send data to the NRC would in my opinion be both a communications and a logistical headache, they would presumably need real time communications, this may or may not be available at the location, they need send and receipt confirmation and also time to establish secure communications, this will add pressure to what they are already under, from current Client, Company and Legal requirements.

Should the data be required I believe the actual volume would be counterproductive, at the end of September there were 2020 drilling rigs operating in the US, I admit not all are using logging sources, Baker Hughes is running over 120 jobs per day, and when the other Companies who provide similar services and those providing Industrial Radiography are added to the equation I think you will be talking of several hundred reports arriving on a daily basis, most of which will be out of date when they are reviewed.

2) Inclusion of quality assurance provision on data submission

I think this is a good idea and if this could be managed electronically I believe it would work fine.

If on the other hand it is relying on a counter signature approach then I don't believe it would work that well.

Who would be authorised to countersign?

What training would they require?

What happens if they are away (vacation, sick etc.) how many authorised signatories are allowed?

Once again I apologise for the lateness of this e-mail.

Regards

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Template = SECY-067

SECY-02

From: Merri Horn
To: Evangeline Ngbea
Date: Tue, Oct 25, 2005 7:50 AM
Subject: Fwd: National Source Tracking Proposed Rules Meeting 10-20-05

Attached for docketing is a comment on the proposed rule (RIN 3150-AH48) that I received via e-mail.

CC: Carol Gallagher

Mail Envelope Properties (435E1BDC.21F : 0 : 2914)

Subject: Fwd: National Source Tracking Proposed Rules Meeting 10-20-05
Creation Date: 10/25/05 7:49AM
From: Merri Horn

Created By: MLH1@nrc.gov

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