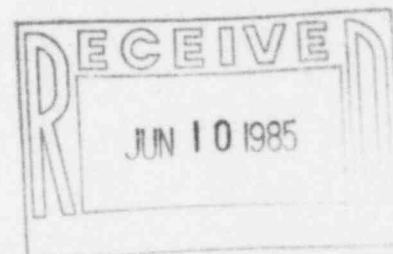




P. O. Box 399
Mills, Wyoming 82644
May 31, 1985

Mr. Robert D Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
611 Ryan Plaza
Arlington, Texas 76011



Docket #30-13047185-01
#30-13047185-02 EA-85-53

Dear Sir:

Reference is made to your letter and instructions of May 20, 1985 regarding the above case. Below is our response to your Notice of Violation:

1. License Condition No. 12 - Regards of Oil Well Perforators do indeed indicate that two individuals not named on current license handled R/A materials.
 - a. Nov. 10-11, 1981 - Mr. Ed Palser handled R/A material. He had been named on our license previously and had been inadvertently omitted on the current license. His training and qualification are quite adequate and he will be added to the named list of users on an amended license we are presently preparing.
 - b. Feb. 10-11, 1981 - Mr. Howard Scott handled R/A material without being named on a current license. Mr. Scott is a 15 year employee and part of our management team and is quite knowledgeable regarding handling R/A materials. In reality a named user (Mr. Clare Schroder) was sent to this particular jobsite before demobilization of the job. Mr. Scott will be named with appropriate documented qualifications on our anticipated amended license.
2. License Condition No. 18
 - a. Sec. 2 of Radiation Procedures - Our records are in agreement with Notice of Violation, and we have no defense for this oversight. Film badges are presently in hand for all users and projected users. We have drastically tightened internal rules and check lists to insure that this requirement is met.
 - b. Item 1 - Use of more than 50 millicuries of iodine 131. Our records also agree with your inspection. We submit this as an oversight on our part due to the rarity with which this event occurs. To prevent this in the future we have added a column in our daily log of materials use that shows a cumulative use for each past 7 days for each individual user of I₁₃₁. We have made arrangements with the local hospital to perform a bioassay if needed.

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- c. Sec. 7 Item 3.4 - R/A Contamination Inspections. A review of our records indicate a degree of sloppiness in keeping these records. A closer audit recently indicates approximately 12 reports unaccounted for.

In place already is a requirement that inspection reports be completed accurately in duplicate before leaving the jobsite and a copy attached and delivered with signed copy of field invoice to the customer representative on location. The second copy is to be returned by the user to our central operations base in Casper for recording and filing. (This provides a ready cross reference through invoice number.) Serial Nos. of survey instruments have been boldly printed on the side of each to prevent misreading and guessing while filling out inspection reports.

3. License Condition No. 16 - Physical inventory of sealed sources. We have been inadvertantly remiss in keeping this record. Our understanding from one NRC inspector in the past was that because we maintained our sealed sources in one location and because we performed wipe tests timely that the wipe tests served inventory and records of these sources as required. A six month inventory is now in place.

4. General Comments

- a. Regulations providing for users only to handle R/A materials are in place and being strictly enforced. Because our Casper, WY branch is the only storage location we have highly adequate control to enforce and see that only qualified and named users may remove, transport and physically use materials.
- b. A reminder bulletin has been sent to all outlying service locations reconfirming to our employees how to conduct themselves when radioactive materials are involved on a jobsite. Our managers have been instructed to monitor and enforce this conduct. In addition, each user who is sent to perform the survey has been instructed to physically direct the conduct of O.W.P. personnel as well as other personnel at the jobsite.

A radiation job safety meeting has been held by the Assistant RPO at every service branch to emphasize and discuss each element of the reminder bulletin mentioned above. (Copy Attached) R/A Safety will be a continuing subject at our regularly scheduled safety and operations meetings.

- c. Agreement States of Washington, Utah, Colorado, and Nebraska - O.W.P. has in the past ignorantly but apparently unlawfully performed operations involving R/A materials in the above states. We have since applied and received authority to lawfully enter the states of Utah, Colorado, and Nebraska. No action has been made regarding Washington because only one isolated operation was performed there and no further activity is anticipated.
- d. A personal audit has been made by the Asst. RPO of O.W.P. branch offices to cross reference field service tickets (involving R/A materials) with records kept in the Casper central office. Approximately 12 operations were noted, primarily in the Montana area, for which inspection records or shipping tickets were not in the Casper files. On at least 6 of these operations the name of a qualified user was not recorded on the field job ticket. We know in reason that on tracer operations (I₁₃₁), only a qualified user could be present because of his expertise required to actually run the part of the survey not associated with actual R/A materials handling.

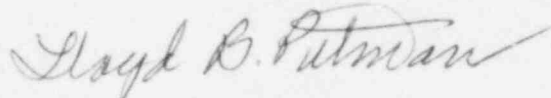
At least 2 jobs involved sealed sources with no paperwork and no name of a qualified user on the job ticket. Because of these omissions we cannot substantiate with certainty that a qualified user was present at the jobsite. (This audit was made subsequent to the NRC enforcement conference.)

Until recently only hourly paid personnel have been required to be named on field service tickets for obvious reasons. It is now required that all personnel (hourly and monthly) be listed, including the R/A user so as to provide a method of cross checking if necessary for audit purposes.

- e. All actions we have taken are in place and proceeding smoothly. An amended license request is being delayed by us awaiting complete plans to dispose of or repair some "Parkwell" sealed sources which have been declared unsatisfactory by a very recent general NRC Bulletin. Use of these sources is not mandatory for efficient operation of our company.

Thank you for your past consideration and the congenial relations with all NRC personnel. We look forward to a continuing mutually agreeable working relationship in the future. Please notify us if we have not sufficiently answered all allegations in your letter, and be assured that our intentions are to fully comply with regulations of your department.

Sincerely,



Lloyd B. Putman
Assistant RPO
Oil Well Perforators, Inc.

att

LBP/slh

cc: Bill Putman RPO - Denver
O.W.P. District Managers



P. O. Box 399
Mills, Wyoming 82644
February 21, 1985

Mr. Arnold Peart
Bureau of Radiation Control
State Dept. of Health
150 W. Temple
Box 2500
Salt Lake City, Utah 84110

Dear Sir:

Reference is made here to our phone conversation of Feb. 20, 1985 requesting a reciprocity license to use radioactive materials in the state of Utah.

Pursuant to your request we are enclosing a copy of our current NRC license.

Our intention is to intermittantly enter your state to perform diagnostic services on oil and gas wells as requested by our clients. All R/A materials and supervisory personnel will be furnished out of our Casper, Wyoming location.

We understand that we will be allowed a cumulative 180 days of actual operation in the state after which a state license will be required. We anticipate not using this much time in our lifetime.

We also agree to notify you at 801-533-6734 three days before entering the state or as soon as possible subject to weekends, holidays etc.

Thank you,

L. B. Putman
Asst. Radiation Safety Officer
Oil Well Perforators, Inc.
307-473-8744

encl

LBP/slh



P. O. Box 399
Mills, Wyoming 82644
February 21, 1985

Mr. Ellis Simons
Div. of Radiological Services
301 Centennial Mall South
P. O. Box 95007
Lincoln, Nebraska 68501

Dear Sir:

Reference is made here to our phone conversation of Feb. 20, 1985, requesting a reciprocity license to use radioactive materials in the state of Nebraska.

Pursuant to your request we are enclosing a copy of our NRC License now in effect.

Our intention is to intermittantly come into your state to perform services on oil and gas wells as requested by our clients.

We understand that we are to call your office before entering the state or as soon as possible to the date we do enter. We are to call 402-471-2168.

We are looking forward to your presence to observe one of our operations.

Thank you,

L. B. Putman
Asst. Radiation Safety Officer
Oil Well Perforators, Inc.
307-473-8744

enc

LBP/slh



oil well perforators



inc.

February 21, 1985

PROCEDURE FOR BIOASSAY

In the event of I_{131} usage which would exceed 50 mci in one weeks time, Natrona County Memorial Hospital has facilities to and has been alerted to the possibility of conducting thyroid scan. Their equipment is capable of providing the exact amount I_{131} in thyroid.

In the event this service is needed or related information is required contact:

Dr. Jack Larimer

577-2415

577-2381

or

Memorial County Hospital
Radiology Dept.



P. O. Box 399
Mills, Wyoming 82644
February 22, 1985

Mr. Chuck Mattson
Colorado Dept. of Health
Radiation Control Division
4210 E. 11th Ave.
Denver, Colorado 80220

Dear Sir:

Reference is made here to our phone conversation of 2-21-85 in which we requested permission to use licensed radioactive materials in the state of Colorado.

Per your request we are enclosing a copy of our current NRC Materials License No. 49-17609-01.

Our intention is to intermittantly enter your state to perform diagnostic services on oil and gas wells as requested by our clients. Supervisory personnel (named in our license) and R/A materials will emanate from our single storage facility in Casper, Wyoming. 2414 N. Nuclear Drive - Phone 307-473-8744.

We understand your requirements as follows:

1. Notify you 3 days prior to entering by letter at the above address. If this is not possible we are to phone you or Larry Doerr as soon as possible at 303-320-8333 and follow with a letter.
2. We are to furnish you with clients name, phone no., and location of well to be surveyed.
3. Abide by the terms and conditions of our NRC license.
4. Furnish amendments to our license in a timely manner.
5. We will be allowed a total 180 cumulative work days per year in the state of Colorado. (We anticipate this time to be 30 days or much less.)

Thank you very much for your assistance.

Sincerely,

Lloyd Putman

Lloyd Putman
Asst. Radiation Safety Officer
Oil Well Perforators, Inc.
307-473-8744

encl
LP/sh



P. O. Box 399
Mills, Wyoming 82644
March 12, 1985

inc.

POST ON BULLETIN BOARD - EACH MAN INITIAL

TO: All Employees
SUBJECT: Radioactive Materials - Safety Reminder

Recently one of our ex-employees has reported us in violation of NRC regulations regarding handling of radioactive materials. This resulted in an investigation and an audit of our records. Because of this we wish to remind you of our established procedure regarding the two isotopes we use:

1. Sealed Sources - (Neutron Logs)
 - (a) A qualified supervisor will bring the source from Casper.
 - (b) The supervisor only will remove the source from its container (on location) and insert it in the logging tool with the handling tool. All other personnel will stand away during this procedure at least 10 ft.
 - (c) The supervisor will then "tail" in the tool and stab it into the well.
 - (d) When the tool is retrieved from the well the reverse procedure will be used. Be sure all personnel are standing back until the source has been returned to its carrier. Never touch a source or allow the rig crew to help while the source is out of its container.
2. Radioactive Iodine - (Tracer Material)
 - (a) The tracer engineer from Casper only will handle the lead "pigs". Do not try to help.
 - (b) Loading of the tracer injector may be performed only by the tracer engineer while the crew is rigging up to the well head. No one is to enter the truck during this procedure.
 - (c) Tracer engineer will screw the injector onto the tool string alone. Again - do not try to help. This would be a violation of NRC rules.
 - (d) When tools are removed from well the reverse procedure is to be followed.

We recognize that there are very few jobs that require this equipment and for that reason you may forget and try to help out at the wrong time, but this help is prohibited by regulation. I will appreciate your cooperation in this effort. Please notify your supervisor if you observe any deviation from the above procedure.

Thank you,

A handwritten signature in cursive script, appearing to read "L. B. Putman".

L. B. Putman
Asst. Radiation Safety Officer

cc Bill Putman, RPO, Denver
All District Managers