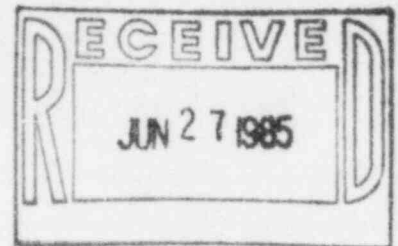


SCHLUMBERGER
NORTH AMERICA WIRELINE SERVICES
5000 GULF FREEWAY, P.O. BOX 2175
HOUSTON, TEXAS 77252-2175, (713) 928-4000



July - 2 - IV
Applicant *011296*
Work No. *170*
Amount, Fee Category *5A*
Type of Fee *Amend*
State Check Rec'd *8/1/85*
Received By *Jacques/Cap*

June 25, 1985

U.S. NRC
LIC. FEE MGMT. BRANCH

85 JUL 15 PM 12:00

RECEIVED

U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive
Suite 1000
Arlington, TX 76012

Reference: Radioactive Materials License 42-0009003

Gentlemen:

In reference to Amendment number 46 (License amended in its entirety) dated June 11, 1985.

This is to request consideration of Condition 13.c. This Condition reads in part "a report shall be filed within 5 days of the test..." We believe the reporting period is unnecessarily short.

I recommend that the words "within 5 days of the test" be replaced by "within 30 days of notification of analysis results." A leaking sealed source is usually not an emergency. A routine wipe test is a preventive measure. Contamination beyond the inside of the source holder probably does not exist. If contamination beyond the inside of the source holder exists, then it is a contamination incident; the reporting of which is well covered in 10 CFR. I assume NRC wants reporting of leaking sources for statistical records and to provide alerts to other licensees if a particular model or manufacturer is prone to leakage. For this, a 30 day reporting requirement should be adequate.

Your reconsideration of this matter will be appreciated.

Sincerely,

C. E. Raester

C. E. Raester
Radiation Safety Officer

CER:md

460700

8510240663 850821
REG4 LIC30
42-00090-03
PDR

Notes
John & Mike
in process of circulating
to all regions a change in
5000 Gulf Freeway
allow 30 day reporting
Submit Raester check back
in couple of months to find out
status of change in then apply for
Amendment
Telephone
Amendment report
Yace