

Rulemaking Comments

**PRM-73-15
(76FR76327)**

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From: Kenny Jordan [kjordan@aesc.net]
Sent: Monday, February 20, 2012 7:01 PM
To: Rulemaking Comments
Subject: Docket ID NRC-2011-0251
Attachments: NRC Draft 2011-0251.doc

Please find attached our comments referencing Docket ID NRC-2011-0251 concerning security of sources.

We appreciate the opportunity to offer our input into the decision making process.

Thanks,

DOCKETED
USNRC

February 21, 2012 (10:30 am)

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Comments on Petition for Rulemaking concerning NRC to require installation of radiation alarms connected to the Public Safety Department for rooms housing neutron sources.

Subject: Docket ID NRC-2011-0251

The Association of Energy Service Companies is a national trade association representing oil and gas service companies that does services in the upstream sector. Our members consist of wireline/well logging companies who on a routine basis utilize sealed sources and in specialized incidents, tracer elements for identification of fluid or injected material flow.

In reviewing the current notice posted for public comment, we feel that the specific circumstances quoted by the petitioner in this case, is not applicable for our type of business in several areas:

- 1.) The petitioner identified areas in a public area or room that has public "traffic" in the areas, whereas in wireline/well logging, our sources are stored in secured areas in areas where the public does not have access (company owned locations with employees access to the area only, and those employees that do have access have had background screening and training to handle and deal with these sources).
- 2.) Companies in our industry store their sources as prescribed by local, state, and national standards that have been established for our industry. Many of those companies also have security systems in place for added security measures above and beyond minimum requirements, such as motion detectors, camera systems, etc.
- 3.) We see some additional vagueness in the petition in terms of definitions of "room", types of radiation alarms, connectivity to law enforcement, etc.

Conclusion:

We do not believe that 10CFR73 as listed in this specific petition should have any impact or is applicable to 10CFR39 that is applicable to the well logging industry.

Respectfully Submitted,

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