

PRM-73-15  
(76FR76327)

# PUBLIC SUBMISSION

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**Docket:** NRC-2011-0251  
Installation of Radiation Alarms in Rooms Housing Neutron Sources

DOCKETED  
USNRC

February 21, 2012 (10:30 am)

**Comment On:** NRC-2011-0251-0001  
Installation of Radiation Alarms for Rooms Housing Neutron Sources

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**Document:** NRC-2011-0251-DRAFT-0003  
Comment on FR Doc # 2011-31367

## Submitter Information

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**Submitter's Representative:** Phil Stoehr

**Organization:** J-W Wireline Company

## General Comment

Docket ID NRC 2011-0251

NRC to require installation of radiation alarms connected to the Public Safety Department for rooms housing neutron sources.

The information contained in the FR notice is vague, to say the least. How is "room" defined? Isotope activities above what activity are impacted? Follow-up phone calls to the NRC shed little light on the overall issue.

While the FR notice specifically lists 10CFR73 as being impacted, I was informed by the NRC that it "may" affect other parts of 10CFR. My concern was (is) with Part 39 (Well Logging).

My company uses security measures that preclude the necessity of adding an "active" monitor. Sources are stored by methods approved by the NRC or Agreement State. Storage is in one of two ways. Either in locked downhole tubes covered with a steel locked door, or in their respective locked transport containers, in locked downhole bunkers or in shielded locked rooms, built specifically for that purpose. In addition, most facilities utilize security systems that include motion detectors, window and door alarms, and security cameras, which are linked to a security company or law enforcement.

Our facilities are fenced, locked when no one is present. Main buildings that contain source storage are also secured during the same time. When the storage bunker is outside the building, a separate locked fence surrounds it.

Other Wireline companies of which I am aware use similar, if not identical methods of neutron

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Template = SECY-067

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source security.

Part 39 should not be included in this rulemaking.

Phil Stoehr, RSO  
Tx License: L06132

## Rulemaking Comments

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**From:** Gallagher, Carol  
**Sent:** Tuesday, February 21, 2012 9:29 AM  
**To:** Rulemaking Comments  
**Subject:** Comment on PRM-73-15  
**Attachments:** NRC-2011-0251-DRAFT-0003.pdf

Attached for docketing is a comment from Phil Stoehr, J-W Wireline Company, on the above noted PRM (76 FR 76327) that I received via the regulations.gov website on 2/20/12.

Thanks,  
Carol