



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BLVD  
ARLINGTON, TEXAS 76011-4511

June 28, 2012

EA-12-099

BP Exploration and Production Inc.  
ATTN: Joe Gallucci  
200 WestLake Park Blvd. 405B  
Houston, Texas 77079

SUBJECT: VERIFICATION OF GENERAL LICENSE REGULATORY REQUIREMENTS

Dear Mr. Gallucci:

This refers to the telephone conversation between Mr. Jason Razo of my staff and yourself on June 25, 2012. The purpose of the call was to notify you that the U.S. Nuclear Regulatory Commission would be sending this letter to you in order to verify that BP Exploration and Production Inc. was in compliance with the requirements of its general license.

BP Exploration and Production Inc. has a general license for the use of radioactive cesium-137 in a sealed source within fixed gauging devices. The devices are affixed to pipelines, subsea in the Gulf of Mexico, in Federal jurisdiction. The NRC regulations in 10 CFR 32.52(a) require that the vendor, Roxar, Inc., report any transfers of generally licensed devices to the NRC. In January 2012, Roxar, Inc. notified the NRC that it had transferred the above-mentioned devices to BP Exploration and Production Inc. between 2002 and 2003.

Due to the non-routine nature of the transfers, the NRC requests that BP Exploration and Production Inc. respond to this letter within 30 days and acknowledge that it understands the requirements of its general license as outlined in 10 CFR 31.5. As part of that response, please verify that BP Exploration and Production Inc. will ensure that the required general license label is affixed to the devices if or when the devices return to the surface.

If you have additional information that you believe the NRC should consider or review, you may provide it in, or attach it to, your response. The NRC review of your response to this request will also determine whether any enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

BP Exploration and Production Inc.

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Should you have any questions concerning this letter, please contact Mr. Jason Razo at 817-200-1589 or Mr. Michael Vasquez at 817-200-1130.

Sincerely,

**/RA/**

Anton Vogel, Director  
Division of Nuclear Materials Safety

Docket: 9999-0004  
General Licensee

cc:  
Texas Radiation Control Program Director

Roxar Flow Measurement, Inc.  
ATTN: Ms. Marie Benson  
Radiation Safety Officer  
6005 Rogerdale Road  
Mail Stop: SC200.2  
Houston, Texas 77072

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|--|---|---|---|------------------------|
| ADAMS  | <input type="checkbox"/> No                     | <input checked="" type="checkbox"/> Yes | <input checked="" type="checkbox"/> SUNSI Review Complete | Reviewer Initials: JMR |
| <input checked="" type="checkbox"/> Publicly Available | <input type="checkbox"/> Non-publicly Available | <input type="checkbox"/> Sensitive      | <input checked="" type="checkbox"/> Non-sensitive         |                        |
| RIV:DNMS/NMSB-A  | C:NMSB-A  | D:ACES                                  | D:DNMS  |                        |
| JMRazo;dlf   | GMVasquez                                       | HJGepford                               | AVegel  |                        |
| /RA/   | <b>JEWhitten for</b>                            | /RA/                                    | /RA/  |                        |
| 6/25/12  | 6/27/12   | 6/27/12                                 | 6/28/12   |                        |

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