



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

July 24, 2012

EA-12-102

Shell Exploration and Production Company
ATTN: Brett G. Tatar
200 N. Dairy Ashford, WCK-7443
Houston, Texas 77079

SUBJECT: VERIFICATION OF GENERAL LICENSE REGULATORY REQUIREMENTS

Dear Mr. Tatar:

This refers to the telephone conversation between yourself and Mr. Jason Razo of my staff on July 19, 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 Shell Exploration and Production Company was in compliance with the requirements of its general license.

Shell Exploration and Production Company has a general license for the use of radioactive cesium-137 in a sealed source within a fixed gauging device. The device is affixed to a pipeline, 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 device to Shell Exploration and Production Company in 2006.

Due to the nature of the transfer, the NRC requests that Shell Exploration and Production Company 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 Shell Exploration and Production Company will ensure that the required general license label is affixed to the device if or when the device returns 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.

Shell Exploration and
Production Company

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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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<input checked="" type="checkbox"/> Publicly Available	<input type="checkbox"/> Non-publicly Available	<input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Non-sensitive	
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