

**Savoy, Joanne**

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**From:** Baker, Stephen  
**Sent:** Wednesday, January 15, 2014 11:48 AM  
**To:** Cynthia Dorris (Cindy.Dorris@Halliburton.com)  
**Cc:** Savoy, Joanne; Smith, Brooke  
**Subject:** PXB183.00

Cindy:

As a follow-up to our conversation on January 14, 2014, here is a summary of the events that necessitated the cessation of processing your most recent application as an amendment application but rather, processing it as an application for a new export license.

On Monday, January 13, we noticed that the dates of expiration of PXB158.00 and the receipt date of the amendment application did not support processing your latest application as an amendment to PXB158.00. Recognizing this at this stage of completion necessitated some corrections to the billing records which represented the application as PXB158.01, as well as alerting HES of the inability to make shipments to the destinations on PXB158.00, as the amendment application not in timely renewal, meaning no shipments could be made until the application for a new license was processed and issued.

It is our understanding that HES had put a stop to any internal requests to make use of the license.

Since the nature of the original amendment request and a new application for an export license have the same processing fee of \$5,400, no financial adjustments (e.g., refund or additional funds request) were necessary. Since no change was made to the nature of the original amendment, there is no need to re-start the 30-day public comment period.

I will be sending a draft version of PXB183.00 for your review very shortly.

Stephen Baker  
U.S. Nuclear Regulatory Commission  
Office of International Programs  
(301) 415-3329

NRC FORM 7  
(11-2012)  
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0027

EXPIRES: (11/30/2015)

# APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S)

(See Instructions on Pages 4 and 5)

Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

<b>PART A. FOR NRC USE ONLY</b>	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC	DATE RECEIVED 12-5-13
LICENSE NUMBER PXB158.01	DOCKET NUMBER 11006021	ADAMS ACCESSION NUMBER ML13340A145

## PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

1. NAME AND ADDRESS OF APPLICANT/LICENSEE  Halliburton Energy Services 2107 City West Blvd., Bldg 4 Houston, TX 77042	1a. NAME OF APPLICANT'S CONTACT Cindy Dorris	1b. APPLICANT'S REFERENCE NUMBER HES3117
	1c. PHONE NUMBER (713) 839-4566	1d. FAX NUMBER (713) 839-4490
	1e. E-MAIL ADDRESS cynthia.dorris@halliburton.com	

2. TYPE OF ACTION REQUESTED (Check One)		CONSENT REQUEST (Parts B, C)
EXPORT (Parts B, C, E)	IMPORT (Parts B, D, E)	AMENDMENT/RENEWAL Current License Number: PXB158.00

3. CONTRACT NUMBER(S)	4. FIRST SHIPMENT DATE 09/01/2013	5. LAST SHIPMENT DATE	6. PROPOSED EXPIRATION DATE 10/31/2015
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## PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT Halliburton Energy Services, Inc. 3000 N. Sam Houston Prkwy East Building M Houston, Tx 77032-3219  Halliburton Energy Services, Inc. 14851 Milner Rd Gate 5 A-Dock SR-1/SR-2 Houston, Tx 70032	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S)	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S)  See page 3 of this Form 7	
7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED	8a. INTERMEDIATE USE(S)	9a. ULTIMATE END USE(S)	
10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS; FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT  Category 2: Americium-241, Americium-214/Beryllium, Cobalt 60, Californium-252, Cesium-137	10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)  N/A	10b. MAX ENRICHMENT OR WGT %  N/A	10c. MAX ISOTOPE WGT (KG)  N/A

11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)

Rec'd  
12-5-13



NRC FORM 7  
(11-2012)  
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

1. LICENSE NUMBER <b>PXB158.01</b>	2. DOCKET NUMBER <b>11006021</b>	3. ADAMS ACCESSION NUMBER <b>nc13340a145</b>	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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## PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT  Multiple Halliburton Energy Services, Inc. and its subsidiary locations onshore and offshore around the world	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)	14. NAME(S) / ADDRESS(ES) OF ULTIMATE U. S. CONSIGNEE(S)	
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES  Category 2: Americium-241, Americium-214/Beryllium, Cobalt 60, Californium-252, Cesium-137	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)  N/A	15b. MAX ENRICHMENT OR WGT %  N/A	15c. MAX ISOTOPE WGT (KG)  N/A

16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)

## PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.		
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Cindy Dorris (ITC Analyst) International Trade Compliance	18b. SIGNATURE -- AUTHORIZED OFFICIAL 	18c. DATE 12/4/13

NRC FORM 7

(11-2012)  
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

# APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER <b>9X158.01</b>	DOCKET NUMBER <b>11006021</b>	ADAMS ACCESSION NUMBER <b>ML133402145</b>	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

The purpose of this application is to request one RA Source license for the multiple countries.

Group of countries to be consolidated on an export license rather than having multiple licenses.

Antigua and Barbuda, Barbados, Belize, Benin, Bhutan, Bosnia and Herzegovina, Botswana, Burkina Faso, Burundi, Cambodia, Cape Verde, Central African Republic, Chad, Congo (Kinshasa), Dominica, East Timor, Eritrea, Fiji, Gambia, Georgia, Grenada, Guinea, Guinea-Bassau, Kenya, Kiribati, Kosovo, Kyrgyzstan, Laos, Lebanon, Lesotho, Liberia, Liechtenstein, Macedonia, Malawi, Maldives, Mali, Malta, Marshall Islands, Mauritius, Micronesia, Moldova, Monaco, Mongolia, Nauru, Nepal, Nicaragua, Palau, Rwanda, Saint Kitts and Nevis, Saint Vincent and the Grenadines, Somoa, San Marino, Sao Tome, and Principe, Senegal, Serbia, Seychelles, Sierra Leone, Solomon Islands, Somalia, Sri Lanka, Swaziland, Tajikistan, Tanzania, Togo, Tuvalu, Uganda, Uzbekistan, Vanuatu, Zambia, and Zimbabwe.

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# HALLIBURTON

International Trade Compliance Group  
2107 City West Blvd., Bldg 4, 13th Floor – Houston, TX 77042  
Direct 713-839-4566 - Fax: 713-839-4490

Deputy Director,  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
Mail Stop O-4E21  
11555 Rockville Pike  
Rockville, Maryland 20852

12/04//2013

**RE: Application for License for the Export and Import of Americium-241, Americium-241/Beryllium, Cobalt 60, Californium-252, Cesium-137  
HES3117**

Deputy Director,

Halliburton Energy Services, Inc. is applying for a license to export and import Category 2: **Americium-241, Americium-241/Beryllium, Cobalt 60, Californium-252, Cesium-137** sources for shipments to the country grouping (see country group attachment). These materials will be used to provide logging and perforating services to our clients by Halliburton Energy Services, Inc., and its subsidiaries in countries we currently do business in and countries in which we may have future business in. These items are subject to the export-licensing jurisdiction of the U. S. Nuclear Regulatory Commission. Enclosed please find Halliburton's check, no 0007181559, in the amount of \$8,700.00 (Eight Thousand, Seven Hundred Dollars, and No Cents) as the application fee for this license.

Sealed sources will remain in the custody of Halliburton Energy Services, Inc. and its subsidiaries at all times, and when not in use, will be stored in a secure facility controlled by Halliburton Energy Services and its subsidiaries.

Halliburton Energy Services, Inc., in consideration of Title 10, Part 110.42 (c) of the Code of Federal Regulations, submits that the NRC-Controlled Items proposed for export are not inimical to the common defense and security of the United States and the proposed exports are consistent with the policies and objectives of the United States Government.

Included in the application package please find (1) a completed and signed copy of NRC Form 7, "Application for License to Export Nuclear Material and Equipment," and (1) Halliburton check for license application processing.

If you should have any questions please do not hesitate to call or write at the above number or address.

Sincerely,

  
Cindy Dorris

Halliburton Energy Services  
International Trade Compliance  
Email: [cynthia.dorris@halliburton.com](mailto:cynthia.dorris@halliburton.com)

*Handwritten note:*  
OK  
12/13  
PDS



### **License Application and Request:**

The purpose of this license application is to request a compilation of countries on one license rather than multiple licenses (one per each country). This application is for RA sources exporting to a group of countries we currently do business in and for countries we may have future business in.

This application criteria is based on business requirements to fulfill Halliburton Energy Services, Inc. and its subsidiaries oil and gas field service work both onshore and offshore throughout the world for shipments that exceed NRC threshold limits per 10 CFR Part 110.

The regulation requires the use of the 'sum of calculations' methodology for multiple or consolidated shipments. Halliburton has several RA sources that are less than the threshold but could exceed the limits if consolidated.

### **Scope of Work:**

Halliburton Energy Services, Inc. (HES) is one of the world's largest providers of products and services to the oil and gas industries. HES offers a broad array of products and services to upstream oil and gas customers worldwide. The Drilling and Formation Evaluation segment is primarily involved in drilling and evaluating the formations related to borehole construction and initial oil and gas formation evaluations and RA sources are a necessary element to the evaluation. RA sources will be used to provide logging and perforating services to our clients worldwide.

### **Halliburton's Corporate Radiation Safety Program:**

Halliburton Energy Services, Inc. (HES), its entities, and its subsidiaries ensure compliance with radioactive source regulations by Company Policy and through the training, execution, and monitoring of our Corporate Radiation Safety Program (CRSP). The purpose of the CRSP program is to define and implement processes that minimize radiation exposure of personnel, property, and the environment resulting from working with radioactive materials and sources used by the company. Key areas covered by the program include:

- Organization and Authority Descriptions
- Radiation Safety Procedures Development and Maintenance
- Radiation Safety Training
- Radiation Exposure Control
- Procedures for Receipt, Handling, Identification, and Disposal of Radioactive Materials

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- Radiological Emergencies and Incidents
- Radiation Protection Equipment Calibration and Maintenance
- Recordkeeping

It is the policy of Halliburton Energy Services, Inc. (HES) that the CRSP be executed both nationally and internationally. HES facilities located in countries with less restrictive regulations shall comply with this program as the minimum acceptable standard of radiation safety. A copy of these guidelines can be provided as required.

#### **End User Authorization to Receive and Possess the Material**

Halliburton Energy Services, Inc. (HES), its entities, and its subsidiaries will be the end users of these materials in the following countries where HES operations.

Licensed materials will be stored at approved Halliburton Energy Services, Inc. facilities only. All current facilities are licensed for use and storage as required by local and international law. All future facilities will also be licensed for use and storage as required by local and international law before import or exports or source are allowed.

The licensed materials shall be used by, or under the supervision and in the physical presence of the Halliburton Energy Service's Radiation Safety Officer, or individuals who have been trained as specified in Halliburton's materials license of individuals designated as users.

Random compliance audits check the effectiveness of each facility's radiation safety program maintenance while providing oversight by the Global Radiation Safety Group. The audit covers all major aspects of all the radioactive material usage. This audit is conducted by a Global Radiation Safety Officer (GRSO), and Associated Radiation Safety Officer (ARSO), a Region Radiation Safety Manager, or a qualified individual designated by a GRS).

#### **Concern for Diversion**

The RA sources authorized for export under this license will only be used by trained employees of Halliburton Energy Services, Inc. and trained employees of its subsidiaries.

Halliburton's Corporate Radiation Safety Program provides auditable processes for storage, usage, transportation, monitoring, and recordkeeping for all radioactive sources as well as training and internal management review to ensure the safety of the people and the environment.

All movements of radioactive sources are pre-screened and approvals are required prior to shipment by the Radiation Safety Group and the International Trade Compliance Department.

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The RA sources authorized for export or import will not be used for any nuclear activities or by any nuclear end users.

The commodities will not be resold without prior approval and notification as required by the NRC and local regulations.

Halliburton Energy Services, Inc. has consistently maintained, monitored, and reported to the Nuclear Regulatory Commission on all licenses related to the control of radioactive materials.

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LCL