J. R. Grimsley
Waste Specialist
GOM HES

Gulf of Mexico SBU
Chevron U.S.A. Inc.
935 Gravier Street, Rm 1496
New Orleans, LA 70112
Tel 504-592-6717
Fax 504-592-6764
RGrimsley@Chevron.com

November 16, 2007

RECEIVED
NOV 27 2007
DNMS

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-4005

Attn: Ms. Rachel Browder, Health Physicist

Re: Change of Radiation Safety Officer, License 17-29267-01

Dear Ms. Browder,

NRC License 17-29267-01 for the installation and operation of nuclear gauges at our Tahiti and Blind Faith facilities offshore Louisiana was issued to Chevron September 18, 2007. Mr. Paul Kunicki, the Radiation Safety Officer (RSO) named in this license, has elected to retire at the end of this year. We hereby request that this license be amended to show myself as the RSO effective January 1, 2008. Information on my background and training are attached for your review.

If you have any questions, please contact me at 504-592-6717.

Very truly yours,

Rusty Grimsley

Enclosures: J. R. Grimsley Résumé
J. R.Grimsley RSO Training Certificate
J. R. Grimsley RSO Training Curriculum

Mo 471581

J. R. Grimsley
Résumé

Education:	1980	BS Physics, Northeast Louisiana University (NLU)
	1980-81	Graduate student, Physics, NLU
	1993	MS Engineering (Environmental), University of New Orleans

Mr. Grimsley joined Chevron in June 1981 as a reserves analyst. Job duties entailed estimation of reserves, forecasting production, and recommendation of drilling and workover targets. He subsequently served as a production engineer, responsible for monitoring of well performance, optimization of existing completions, and coordination and supervision of field work. Mr. Grimsley recommended well designs and completions, and evaluated and implemented specialty tubing and chemical injection systems.

In 1991, Mr. Grimsley was assigned to the Business Unit Staff Health, Environment, & Safety (HES) group as an environmental and regulatory specialist. Mr. Grimsley has worked in water, air and waste arenas, focusing on regulatory interpretation, training, and compliance. He has participated in laboratory audits and quality control reviews, and, while working as a Water Compliance Specialist, implemented new discharge permit requirements for analysis of discharges for Radium 226 and 228 content. He selected the laboratory, selected sample containers, recommended sampling procedures, reviewed analytical reports, and reported data to EPA.

In 2004, Mr. Grimsley was assigned as Waste Specialist for the Gulf of Mexico Business Unit. His duties encompass all waste-related activity, including disposal of naturally occurring radioactive material (NORM). He is responsible for minimization of waste volumes, documentation of waste shipments, and selection of appropriate disposal facilities. Mr. Grimsley completed 8-hour NORM Surveying and Control training in July 2004. In July 2007, he completed 40-hour Radiation Safety Officer training, and was re-certified in NORM surveying.

Mr. Grimsley is the Business Unit coordinator for environmental impact evaluations, and facilitates the environmental, social and health portions of the risk assessment process. He is the Business Unit subject matter expert on DOT hazardous materials regulations. He is a member of the Business Unit Emergency Response Team, is certified as a Level 3 technician and a Level 5 On Scene Incident Commander in accordance with 29 CFR 1910.120(q), and has served in a variety of roles in both drills and actual responses. Mr. Grimsley has received and/or presented training in the following areas:

Title V and state-only air permitting
State and federal water discharge permitting
Spill prevention countermeasures & control plans
Oil transfer manuals & Facility response plans
Stormwater pollution prevention plans
Emergency response / Incident command
Sanitary waste treatment
Hazardous materials transportation
Waste management & hazardous waste disposal
Field environmental and safety auditing
Laboratory auditing
Sample collection procedures
Chain of custody requirements
Radiation Safety & Surveying
Behavior-based safety programs
Confined space entry
CPR/First aid
Drilling and workover operatons
Electrical safety
Ergonomics
Field production equipment
Fire protection
Hot work permits
Incident investigation
Lock out / tag out systems
Simultaneous operations
Sample analysis procedures

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Certificate of Qualification

This is to certify that

J.R. Grimsley

has successfully completed an approved 40-hour training course as a

NORM Radiation Safety Officer

The course included a practical assessment and written examination

Certification Date: July 9th through July 12th, 2007

Location: Lafayette, Louisiana

Mark W. Krohn
Instructor
American Radiation Services, Inc.

ARS INTERNATIONAL

ARS INTERNATIONAL

2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

July 23, 2007

Louisiana Department of Environmental Quality
Office of Environmental Services
Permits Division, Radiation Protection Section
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Dear Sir or Madam:

This letter is to certify that Mr. J.R. Grimsley has successfully completed a 40-hour training course as a "NORM Radiation Safety Officer". The course was held on July 9th through July 12th, 2007 in Lafayette, Louisiana. The course included instruction for NORM Surveyors as required by the Louisiana Administrative Code, Title 33, Part XV, Chapter 14, Appendix A, and for Radiation Workers as required by Chapter 10, Article 1012. The course also included, but was not limited to, the following:

- Fundamentals of Radiation
- Sources of Radiation (NORM)
- Biological Effects of Radiation
- Exposure Risk to the Unborn Child
- Radiation Protection Principles
- ALARA, Exposure Minimization
- Protective Clothing
- Emergency Actions
- Respiratory Protection Requirements
- Federal Regulations
- Louisiana Radiation Regulations
- State Notification Requirements
- Radiation Protection Programs
- Type of Survey Instruments
- Radiation and Contamination Survey Techniques
- Documentation Requirements
- Radiation Survey Instrument Calibration Requirements
- Radiological Sampling
- Analytical Methodologies and Equipment
- Personnel Monitoring
- Dose Assessment
- Waste Management Program
- Disposal Options
- Shipping and Manifesting
- Legal Responsibilities
- RSO Responsibilities
- Liability Minimization
- RSO Problems and Solutions
- Worker Rights, Notice to Workers
- Postings, Labeling
- Practical Survey Session
- Written Test

If you have any questions, or need assistance, please don't hesitate to call any of the ARS staff at 1-800-401-4277.

Sincerely,

Mark W. Krohn
American Radiation Services, Inc.

Certificate of Qualification

This is to certify that

J.R. Grimsley

has successfully completed an eight hour training course in

NORM Surveying and Control

The course included a practical survey assessment and a written examination

Certification Date: July 12, 2007

Location: Lafayette, Louisiana

Mark Krohn
Instructor
American Radiation Services, Inc.

ARS INTERNATIONAL

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ARS INTERNATIONAL

2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

July 12, 2007

Louisiana Department of Environmental Quality
Office of Environmental Services
Emergency & Radiological Services Division
P.O. Box 4312
Baton Rouge, Louisiana 70821-4312

Dear Sir or Madam:

This letter is to certify that Mr. J.R. Grimsley has successfully completed a training course in "NORM Surveying and Control" held on July 12, 2007, in Lafayette, Louisiana. The course included instruction for NORM Surveyors as required by the Louisiana Administrative Code, Title 33, Part XV, Chapter 14, Appendix A, and for Radiation Workers as required by Chapter 10, Article 1012. This course also included, but was not limited to the following:

- Origin of NORM
- Sources of Radiation
- State Regulations
- Documentation Requirements
- Types of Radiation
- Radiation and Contamination Units
- Biological Effects
- Exposure Minimization
- Protective Clothing
- Radiation Survey Instrument Theory
- Radiation and Contamination Survey Techniques
- Radiation Survey Instrument Calibration Requirements
- Exposure to the Unborn Child
- Personnel Monitoring
- Emergency Actions
- Practical Survey Session
- Written Examination

If you have any questions, or need assistance, please don't hesitate to call any of the ARS staff at 1-800-401-4277.

Sincerely,

Mark Krohn
American Radiation Services, Inc.

Certificate of Qualification

This is to certify that

J.R. Grimsley

has successfully completed a training course in

Transportation of Naturally Occurring Radioactive Material

The course met the training requirements of 49CFR172.700 through 172.704 and Chapter 15 of LAC 33:XV as they pertain to the radiation hazards associated with the transportation of NORM.

Certification Date: July 11, 2007

Location: Lafayette, Louisiana

Mark W. Krohn
Instructor
American Radiation Services, Inc.

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ARS INTERNATIONAL

2609 North River Road • Port Allen, Louisiana 70767

1 (800) 401-4277 • Fax (225) 381-2996

July 11, 2007

U.S. Department of Transportation
400 Seventh Street SW
Washington, DC 20590

Dear Sir or Madam:

This letter is to certify that Mr. J.R. Grimsley has successfully completed a training course in the "Transportation of Naturally Occurring Radioactive Material." The course was held on July 11, 2007 in Lafayette, Louisiana. The course met the training requirements contained in 49CFR172.700 through 49CFR172.704 as they pertain to radiation hazards associated with the transportation of Naturally Occurring Radioactive Material. The course included, but was not limited to, the following:

- General awareness / familiarization training
- Function specific training
- Safety training
- Emergency response information requirements
- Measures to protect the employee from radioactive material in the work place including specific measures to protect employees from radiation exposures
- Methods and procedures for avoiding accidents
- Security awareness training
- Hazard communication training as it applies to the transportation of naturally occurring radioactive materials

If you have any questions, or need assistance, please don't hesitate to call any of the ARS staff at 1-800-401-4277.

Sincerely,

Mark W. Krohn
American Radiation Services, Inc.

No 471581

DEC 10 2007

DATE

This is to acknowledge the receipt of your letter/application dated 11-16-07, and to inform you that the initial processing, which includes an administrative review, has been performed.

☒ There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

☐ A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 421581.
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,

Colleen Monahan

Licensing Assistant

NRC FORM 532 (RIV)
(10-2006)

ACCEPTANCE REVIEW MEMO (ARM)

Licensee: Chevron U.S.A., Inc. **License No.:** 17-29267-01

Docket No.: 030-37496 **Mail Control No.:** 471581

Type of Action: Amend **Date of Requested Action:** 11-16-07

Reviewer Assigned: **ARM reviewer(s):** Torres

Response	Deficiencies Noted During Acceptance Review
	[ ] Open ended possession limits. Limit possession. Submit inventory. [ ] Submit copies of most recent leak test results. [ ] Add - delete IC license condition. Add IC paragraph in cover letter. [ ] Split license from cover letter. Add SUNSI marking to license. [ ] Ask the licensee if they have any type-amount of EPAct Material.

Reviewer's Initials: _____ **Date:** _____

☐Yes ☐No Unrestricted release Group 2 or >: Transfer memo to FCDB within 10 days.

☐Yes ☐No Decommissioning notification should be completed within 30 days.

☐Yes ☐No Termination request < 90 days from date of expiration after 1/1/08

☑Yes ☐No Expedite (medical emergency, no RSO, location of use/storage not on license, RAM in possession not on license, other)

☐Yes ☐No TAR needed to complete action.

Branch Chief's and/or Sr. HP's Initials: RTC **Date:** DEC -7 2007

SUNSI Screening according to RIS 2005-31

☐Yes ☑No **Non-Publicly Available, Sensitive** if any item below is checked

General guidance:

_____RAM = or > than Category 3 (Table 1, RIS 2005-31), use Unity Rule
_____Exact location of RAM (whether = or > than Category 3 or not)
_____Design of structure and/or equipment (site specific)
_____Information on nearby facilities
_____Detailed design drawings and/or performance information
_____Emergency planning and/or fire protection systems

Specific guidance for medical, industrial and academic (above Category 3):

_____RAM quantities and inventory
_____Manufacturer's name and model number of sealed sources & devices
_____Site drawings with exact location of RAM, description of facility
_____RAM security program information (locks, alarms, etc.)
_____Emergency Plan specifics (routes to/from RAM, response to security events)
_____Vulnerability/security assessment/accident-safety analysis/risk assess
_____Mailing lists related to security response

Branch Chief's and/or Sr. HP's Initials: RTC **Date:** DEC -7 2007

Pre-Licensing Screening

Applicant Information: **Control No.** 471581

Name: Chevron U.S.A., Inc.	Type of Request: Amend Program Code(s): 03120
Location: LA	License No.: 17-29267-01 Docket No.: 030-37496

STEP 1–Radioactive Materials and Quantities Requested:

		Yes or No
Instructions for Step 1: Complete Step 1 for all applications. If all your responses in Step 1 are "No" then do not complete Step 2 (Screening Criteria). Sign and date the completed step-sheet and add it as the sensitive and non-publicly available OAR in ADAMS. If a "yes" response is indicated for any item in Step 1, also complete Step 2. If the type of use is subject to a Security Order or the requirements for increased controls, complete Step 3 (Item A or Item B) without delay.		
A.	The request is from a new applicant.	No
B.	NUREG-1556, Volume 20, Section 4.9 indicates a licensing site visit is needed for the requested type of use, e.g., (1) Type A broad scope license, (2) panoramic irradiator containing > 10000 curies, (3) manufacturers or distributors using unsealed radioactive material or significant quantities of sealed material, (4) radioactive waste brokers, (5) radioactive waste incinerators, (6) commercial nuclear laundries, and (7) any other application that in the judgement of the reviewer and cognizant supervisor involves complex technical issues, complex safety questions, or unprecedented issues that warrant a site visit.	No
C.	The applicant requested certain radionuclides and quantities that equal or exceed the Risk Significant Quantity (TBq) values in the table, below, that have been "highlighted" by the reviewer	No

Table of Risk Significant Quantities

(Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005)

Radionuclide	Risk Significant Quantity (TBq[1])	Risk Significant Quantity (Ci[1])	Radionuclide	Risk Significant Quantity (TBq[1])	Risk Significant Quantity (Ci[1])
Am-241	0.6	16	Pm-147	400	11,000
Am-241/Be	0.6	16	Pu-238	0.6	16
Cf-252	0.2	5.4	Pu-239/Be	0.6	16
Cm-244	0.5	14	Ra-226[2]	0.4	11
Co-60	0.3	8.1	Se-75	2	54
Cs-137	1	27	Sr-90 (Y-90)	10	270
Gd-153	10	270	Tm-170	200	5,400
Ir-192	0.8	22	Yb-169	3	81

[1] The primary values are TBq. The curie (Ci) values are for informational purposes only.

[2] The Atomic Energy Act, as amended by the Energy Policy Act of 2005, authorizes NRC to regulate Ra-226 and NRC is in the process of amending its regulations for discrete sources of Ra-226.

Calculations of the Total Activity or the Unity Rule are attached to document whether or not the screening criteria in Step 2 were also completed to evaluate the application. **NOTE–If an amendment of an existing license is being requested, the calculations will include the previously authorized quantities for the radionuclide(s).**	Yes , No, or Not Applicable (NA)
Total Activity–multiple activities are requested for a single radionuclide and the sum of the activities equals or exceeds the quantity of concern for the radionuclide	—
Unity Rule--multiple radionuclides are requested and the sum of the ratios equals or exceeds unity, e.g.,[(total activity for radionuclide A) ÷ (risk significant quantity for radionuclide A)] + [(total activity for radionuclide B) ÷ (risk significant quantity for radionuclide B)] ≥ 1.0.	—

Signature and Date for Step 1:

DEC - 7 2007

License Reviewer and Date

	:	(FOR LFMS USE)
	:	INFORMATION FROM LTS
BETWEEN:	:	----------
	:	
License Fee Management Branch, ARM	:	Program Code: 03120
and	:	Status Code: 0
Regional Licensing Sections	:	Fee Category: 3P
	:	Exp. Date: 20170930
	:	Fee Comments: _____
	:	Decom Fin Assur Reqd: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED
   Applicant/Licensee: CHEVRON U.S.A. INC
   Received Date: 20071127
   Docket No: 3037496
   Control No.: 471581
   License No.: 17-29267-01
   Action Type: Amendment

2. FEE ATTACHED
   Amount: /
   Check No.: /

3. COMMENTS

Signed Colleen Murnahan
Date 11-30-07

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /__/)

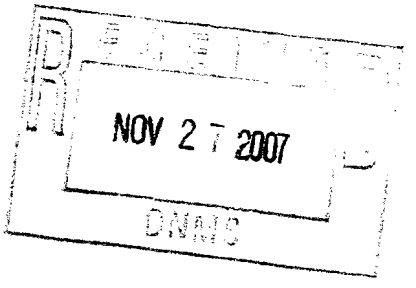
1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:
   Amendment _____
   Renewal _____
   License _____

3. OTHER _____
   _____

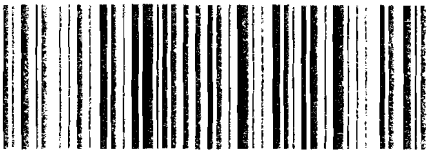
Signed _____
Date _____

7006 2760 0004 9447 6384



Rachel Browder
Nuclear Materials Licensing Branch
U.S. NRC Region IV
Arlington TX 76011-4005

J R. Grimsley
Chevron GOM HES
935 Gravier St., Rm. 1496
New Orleans, LA 70112



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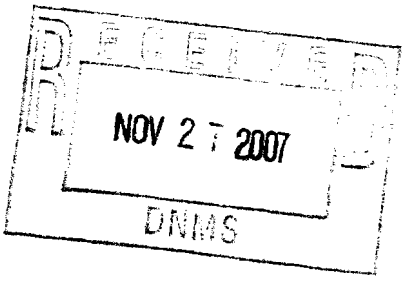

Rachel Browder
Nuclear Materials Licensing Br
U.S. NRC Region IV
Arlington TX 76011-4005