

Baker, Stephen

From: Pam Loprete [Pam.Loprete@Halliburton.com]
Sent: Tuesday, October 27, 2009 2:30 PM
To: Baker, Stephen
Cc: Cynthia Dorris
Subject: FW: Halliburton Withdrawal of Application PCB113.00

Mr. Baker,

As per our phone discussion last week we would like to withdraw the license application PCB113.00 and are requesting a full refund of the \$4600 provided to process that license.

As noted during our conference call and in your email below it is our understanding that today the US Nuclear Regulatory Commission does not authorize exports from non U.S. country to foreign country irrespective of the fact that the goods originated in the United States or that they are manufactured in the U.S.

This particular transaction was for the export of RA goods from Malaysia to the Phillipines which exceeded the US NRC quantities of concern thresholds.

As per your advice we will proceed with the transaction based on approval from both the Malaysian and Philippine Governments.

During the same discussion we requested a broader statement on this issue to ensure we are in compliance with the NRC on future transactions. As there have been no federal register notices on this issue we were unaware that this activity was no longer required. It was our understanding that the regulation was still in effect. As a result, Halliburton has been applying for similar license approvals for a period in excess of three years. Once we receive your statement clarifying the NRC's existing position, we will modify our internal control program accordingly.

It is important to note that we have been applying local law as well so we were not replacing local licenses, we were supplementing them as an extension of the U.S. regulation to other countries where the goods were of US origin, exceeding quantities of concern, and being exported. This has become a significant part of our compliance program which is why we are requesting documentation of the change from the NRC before making internal changes to the program itself.

As always, your assistance is most appreciated.

Regards,
Pam Loprete
Halliburton Energy Services
Sr. Intl. Trade Compliance Mgr.
713-839-4549 (Office)
713-494-8838 (Cell)

From: Baker, Stephen [mailto:Stephen.Baker@nrc.gov]
Sent: Friday, October 16, 2009 4:00 PM
To: Ann Romero
Cc: Cynthia Dorris; Owens, Janice
Subject: Malaysian Regulator Info

Ann / Cindy:

In support of HES's need to export a source from Malaysia to the Philippines, I am sending you the contact information for the regulatory body in Malaysia. The Malaysian government is responsible for their own exports.

The NRC cannot authorize exports from countries other than the United States.