



RECEIVED

AUG 27 2012

Shell Exploration & Production Company
Health Safety and Environment
P. O. Box 576
Houston, TX 77001-0576
United States of America
Tel +1 281 544 5418
Telex <http://www.shell.com/eandpen>

August 22, 2012

DNMS

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7011 0470 0001 6096 2811**

Director, Division of Nuclear Materials Safety
ATTN: Anton Vogel
U.S. Nuclear Regulatory Commission
1600 East Lamar Blvd.
Arlington, TX 76011-4511

Dear Mr. Vogel:

SUBJECT: VERIFICATION OF GENERAL LICENSE REGULATORY REQUIREMENTS

In response to your July 24, 2012 letter, SEPCo acknowledges responsibility to comply with the NRC regulations as outlined in 10 CFR 31.5 and general license no. 725731 addressing the use of a subsea multiphase flowmeter with a sealed Cs-137 source acquired from Roxar Flow Measurement ("Roxar") in 2006.

In accordance with the general license and compliance requirements of 10 CFR 31.5, SEPCo will notify Roxar and ensure a general license label is affixed to the sealed device at such time when the device is returned to the surface. SEPCo will also notify Roxar and the NRC in the event the subsea flow meter may be transferred to another user.

If there are any questions or clarifications required, please do not hesitate to contact me at (281) 544-5418.

Kind regards,

Brett G. Tatar, CIH
Sr. Industrial Hygienist / Radiation Safety Officer

BGT/sal

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