



eni us operating

eni us operating co. inc.
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October 23, 2012

Mr. Anton Vogel
Director – Division of Nuclear Materials Safety
United States Nuclear Regulatory Commission -Region IV
1600 East Lamar Blvd.
Arlington, Texas 76011-4511

RE: Eni U.S. Operating Company – Verification of General License Regulatory Requirements

Dear Mr. Vogel;

Eni US Operating Co., Inc (Eni) has received your letter dated August 8th, 2012 about verification of General License Regulatory Requirements.

We acknowledge that we currently have four subsea density gauges containing radioactive cesium-137 in a sealed source and that these devices were purchased from our vendor Roxar, Inc. in 2006 and are affixed to subsea pipelines in the Gulf of Mexico. We understand that Roxar notified the NRC that it had transferred the above mentioned devices to ENI Petroleum in 2006.

We were recently informed by Roxar that we were granted a general license for use of these devices and now understand we have an obligation to register the sources with the U.S. Nuclear Regulatory Commission (NRC) and to notify the NRC at such time that ENI may transfer the source to another user. We now understand the requirements of the general license as outlined in 10 CFR 31.5 and verify that Eni Petroleum will ensure that the general license label is affixed to the devices if or when the devices return to the surface for reasons other than decommissioning.

We also understand that a licensed and trained Technician from ROXAR must be present to properly and safely perform any maintenance or decommissioning activities and the appropriate notifications of such activities be forwarded to the NRC.

All four of these subsea density gauges are slated for decommissioning within the next few months. We have been in contact with the Roxar Service Coordinator and Radiation Safety Officer to coordinate appropriate service engineers to help with the decommissioning process. ENI will send the proper NRC Form 664 to document transfer of radioactive sources back to Roxar, Inc. upon completion of the project.



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On behalf of Eni Petroleum, we appreciate your assistance with this matter and we apologize for the tardy submittal of reply.

Please contact us if you have any questions or need additional information.

Sincerely,

Giancarlo Mangiafico
ENI Production Operations Projects Coordinator

cc: Roxar Flow Measurement, Inc.
ATTN: Ms. Marie Benson
6005 Rogerdale Road
Mail Stop: SC200.2
Houston, Texas 77072

cc: Mike Dibello – ENI GOM Production Operations Manager
Hans Neidig – ENI Governmental and External Affairs Manager
Robert Hines – ENI Environmental Protection Manager
Brenda Montalvo – ENI Sr. Regulatory Specialist
Donna Sedlar – ENI Regulatory Specialist