



David Estes
Gulf of Mexico HSE Specialist / RSO

August 23, 2021

Director, Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk/GLTS
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

The purpose of this letter is to request a change to Chevrons Specific License renewal application #17-29267-01 responses for additional information dated September 16, 2017. When Chevron filed the Specific License renewal documents in 2017, Chevron inadvertently restricted ourselves in the ability to conduct the fixed gauge shutter tests as required in NUREG 1556, Volume 4, 8.10.8. Therefore, we would like to change the language that was submitted in the September 16, 2017 reply to NRCs request for additional information dated August 23, 2017. The language change requests in reference to the August 23, 2017 request for additional information are as follows:

Application for Materials License Form Item 10.2: RADIATION SAFETY PROGRAM – RADIATION MONITORING INSTRUMENTS

The following paragraph on the Appendix B Checklist “Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys” was marked **YES** with the following statement from Chevron included: *TRACERCO conducts all the surveys, leak, and shutter tests for the fixed gauges for Chevron U.S.A. Inc.*

Requested language change to read: *Tracerco conducts all the surveys and leak tests for fixed gauges for Chevron USA Inc.*

Application for Materials License Form Item 10.8: RADIATION SAFETY PROGRAM MAINTENANCE ROUTINE MAINTENANCE

August 23, 2017 Language reads: *Chevron U.S.A. does not perform routine maintenance on the fixed gauges. TRACERCO performs the routine maintenance and schedules the activity.*

Requested Language change to read: *Chevron will conduct Routine Maintenance by certified Chevron Site RSOs or Authorized Users trained by the manufacture Tracerco. Chevron will implement and maintain procedures for routine maintenance of our gauges according to each manufactures or distributors written recommendations or instructions.*

Sincerely,

David Estes
HSE Specialist / RSO
Chevron Gulf of Mexico Business Unit

David E Estes

Print / Type Name

Signature

Chevron Gulf of Mexico RSO

Title

August 23, 2021

Date

David Estes
Gulf of Mexico HSE Specialist / RSO
Chevron U.S.A. Inc.
100 Northpark Boulevard, Covington, LA 70433
Tel 985 773 1884 Mobile 505 320 3201
eest@chevron.com

From: [Estes, David](#)
To: [Alldredge, Casey](#)
Cc: [Estes, David](#)
Subject: [External_Sender] RE: Chevron Specific License #17-29267-01 Amendment to conduct Routine Maintenance
Date: Monday, August 23, 2021 4:09:05 PM
Attachments: [Chevron Amendment request to conduct Routine Maintenance.pdf](#)

That works really good for myself. Attached is the amendment requested signed by myself for your review.

Thanks again for your help.

Dave Estes
Environmental HSE Specialist/GOM RSO
Chevron Gulf of Mexico
Off. 985-773-1884
Cell. 505-320-3201
100 North Park Blvd, S2240B
Covington, LA. 70433

From: Alldredge, Casey <Casey.Alldredge@nrc.gov>
Sent: Monday, August 23, 2021 2:51 PM
To: Estes, David <eest@chevron.com>
Subject: **[**EXTERNAL**]** RE: Chevron Specific License #17-29267-01 Amendment to conduct Routine Maintenance

Yes this matches what is described in the NUREG. If you want to save it as a pdf and digitally sign it, that is easier for me than mailing it. We are all still working remotely due to the public health emergency, so we can process things that come in from email a lot quicker. But if you would rather mail it, that is ok too.

Thanks,

Casey Alldredge
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV, USNRC

From: Estes, David <eest@chevron.com>
Sent: Monday, August 23, 2021 1:37 PM
To: Alldredge, Casey <Casey.Alldredge@nrc.gov>
Cc: Estes, David <eest@chevron.com>
Subject: [External_Sender] Chevron Specific License #17-29267-01 Amendment to conduct Routine Maintenance

Casey,

I have attached a letter I believe will satisfy your request below but wanted to make sure before I sent it certified mail. Can you take a look and see if this will suffice?

I appreciate your help over the last year with myself being new in this role.

Dave Estes
Environmental HSE Specialist/GOM RSO
Chevron Gulf of Mexico
Off. 985-773-1884
Cell. 505-320-3201
100 North Park Blvd, S2240B
Covington, LA. 70433

From: Alldredge, Casey <Casey.Alldredge@nrc.gov>
Sent: Monday, August 16, 2021 4:45 PM
To: Estes, David <eest@chevron.com>
Subject: [****EXTERNAL****] Chevron License Amendment

David,

I am processing your license amendment request, dated July 1, 2021. Per NUREG 1556 Volume 4, shutter testing is considered routine maintenance. In accordance with NUREG 1556 Volume 4 Appendix B, please either confirm the statement: "We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's or distributor's written recommendations and instructions" or provide alternative procedures for NRC review. Please provide this in a signed letter.

If you have any questions, please let me know.

Thanks,

Casey Alldredge
Health Physicist
Materials Licensing and Decommissioning Branch
Region IV, USNRC



David Estes
Gulf of Mexico HSE Specialist / RSO

August 23, 2021

Director, Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk/GLTS
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

The purpose of this letter is to request a change to Chevrons Specific License renewal application #17-29267-01 responses for additional information dated September 16, 2017. When Chevron filed the Specific License renewal documents in 2017, Chevron inadvertently restricted ourselves in the ability to conduct the fixed gauge shutter tests as required in NUREG 1556, Volume 4, 8.10.8. Therefore, we would like to change the language that was submitted in the September 16, 2017 reply to NRCs request for additional information dated August 23, 2017. The language change requests in reference to the August 23, 2017 request for additional information are as follows:

Application for Materials License Form Item 10.2: RADIATION SAFETY PROGRAM – RADIATION MONITORING INSTRUMENTS

The following paragraph on the Appendix B Checklist “Surveys according to 10 CFR 20.1501 will be performed by a person specifically authorized by the NRC or an Agreement State to perform these surveys” was marked **YES** with the following statement from Chevron included: *TRACERCO conducts all the surveys, leak, and shutter tests for the fixed gauges for Chevron U.S.A. Inc.*

Requested language change to read: *Tracerco conducts all the surveys and leak tests for fixed gauges for Chevron USA Inc.*

Application for Materials License Form Item 10.8: RADIATION SAFETY PROGRAM MAINTENANCE ROUTINE MAINTENANCE

August 23, 2017 Language reads: *Chevron U.S.A. does not perform routine maintenance on the fixed gauges. TRACERCO performs the routine maintenance and schedules the activity.*

Requested Language change to read: *Chevron will conduct Routine Maintenance by certified Chevron Site RSOs or Authorized Users trained by the manufacture Tracerco. Chevron will implement and maintain procedures for routine maintenance of our gauges according to each manufactures or distributors written recommendations or instructions.*

Sincerely,

David Estes
HSE Specialist / RSO
Chevron Gulf of Mexico Business Unit

David E Estes

Print / Type Name

Signature

Chevron Gulf of Mexico RSO

Title

August 23, 2021

Date

David Estes
Gulf of Mexico HSE Specialist / RSO
Chevron U.S.A. Inc.
100 Northpark Boulevard, Covington, LA 70433
Tel 985 773 1884 Mobile 505 320 3201
eest@chevron.com