


<b>NRC FORM 7</b> (01-05-2023) 10 CFR 110		<b>U. S. NUCLEAR REGULATORY COMMISSION</b>		<b>APPROVED BY OMB: NO. 3150-0027</b>		<b>EXPIRES: 05/31/2025</b>	
		<b>APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S)</b> (See Instructions on Pages 4 and 5)				Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to <a href="mailto:Infocollects.Resource@nrc.gov">Infocollects.Resource@nrc.gov</a> , and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0027), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; email: <a href="mailto:oir_submission@omb.eop.gov">oir_submission@omb.eop.gov</a> . The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.	
<b>PART A. FOR NRC USE ONLY</b>		<input checked="" type="checkbox"/> Public <b>OR</b> <input type="checkbox"/> Non-Public		Date Received 7/19/2023 CTS			
License Number PXB244.00		Docket Number 11006570		Adams Accession Number			
<b>PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
1. Name and Address of Applicant/Licensee  Halliburton Energy Services 3000 N. Sam Houston Pkwy. E. Houston, TX 77032			1a. Name of Applicant's Contact Kateri Noel		1b. Applicant's Reference Number HES3459		
			1c. Office Telephone Number (713)839-4929		1d. Office Facsimile Telephone Number		
			1e. Applicant's Email Address kateri.noel@halliburton.com				
2. Type of Action Requested		<input checked="" type="checkbox"/> Export (Parts B, C, E)		<input type="checkbox"/> Amendment/Renewal		Current License Number:	
		<input type="checkbox"/> Import (Parts B, D, E)		<input type="checkbox"/> Consent Request (Parts B, C)		Current License Number:	
3. Contract Number(s)				4. First Shipment Date	5. Last Shipment Date	6. Proposed Expiration Date	
<b>PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS</b> (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)							
7. Name(s)/Address(es) of U. S. Suppliers and/or other U. S. Parties to the Export  Halliburton Energy Services Inc. 14851 Milner Rd. Gate 5 A Dock SR-1/SR-2 Houston, TX 77032			8. Name(s)/Address(es) of Intermediate Foreign Consignee(s)  Special Cargo Services BV Breguetlaan 9 1438 BA Oude Meer Netherlands		9. Name(s)/Address(es) of Ultimate Foreign Consignee(s)  See Page 3		
7a. Function(s) Performed/Service(s) Provided Exporter			8a. Intermediate Use(s) Freight Forwarder		9a. Ultimate End Use(s) Provide logging and perforating services		
10. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities, Equipment, or Components; for Nuclear Equipment include Total Dollar Value of Equipment for Export  Category 2: Americium-241, Americium-241/Beryllium, Cobalt 60, Cesium-137				10a. Maximum Total Volume/Element WGT (KG), or Total Activity (TBq)  N/A	10b. Max Enrichment or WGT%  N/A	10c. Max Isotope WGT (KG)  N/A	
11. Foreign origin or obligations by country and, if known, by percentage of maximum total volume (leave blank for byproduct licenses)							

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(01-05-2023)  
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U. S. NUCLEAR REGULATORY COMMISSION

**APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)**

License Number PXB244.00	Docket Number 11006570	Adams Accession Number	<input checked="" type="checkbox"/> Public <b>OR</b> <input type="checkbox"/> Non-Public
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**PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS**

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. Name(s)/Address(es) of Foreign Suppliers and/or other Foreign Parties to Import	13. Name(s)/Address(es) of Foreign or U. S. Intermediate Consignee(s)	14. Name(s)/Address(es) of Ultimate U. S. Consignee(s)	
12a. NRC Export License Number(s) (if applicable)	13a. License Number(s) / Expiration Date(s)	14a. License Number(s) / Expiration Date(s)	
	13b. Intermediate Use(s)	14b. Ultimate End Use(s)	
15. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities	15a. Maximum Total Volume/ Element WGT (KG), or Total Activity (TBq)	15b. Max Enrichment or WGT%	15c. Max Isotope WGT (KG)

16. Foreign obligations (By country and by Percentage of Maximum Total Volume)

**PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)**

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

17. Additional Information provided on pages 3, 4, and/or separate sheets? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	17a. Copies of Recipient's Authorizations Provided? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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18. Certification:

**I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.**

18a. Print Name and Title of Authorized Official Kateri Noel International Trade Compliance Analyst	18b. Signature -- Authorized Official Kateri Noel Digitally signed by Kateri Noel Date: 2023.07.18 09:41:22 -05'00'	18c. Date
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(01-05-2023)  
10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

**APPLICATION FOR NRC EXPORT OR IMPORT  
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)**

License Number <b>PXB244.00</b>	Docket Number <b>11006570</b>	Adams Accession Number	<input checked="" type="checkbox"/> Public <b>OR</b> <input type="checkbox"/> Non-Public
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Additional Information (Reference applicable block numbers from page 1 and/or page 2 for each entry)

Ultimate Consignee(s) and physical address(es):

Basra Oil Company  
Bab Al Zubair Area  
Basra, Iraq

Eriell Oilfield Services B.V.  
Rusafa, District 906, Lane 14  
West Qurna, Iraq

Lukoil Mid-East Limited  
Block 10 West Qurna-2 Oilfield  
West Qurna, Iraq

Halliburton Worldwide Limited  
29 Western Burjese  
Burjesia, Iraq

End Use:  
Provide logging and perforating services



# HALLIBURTON

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3000 N. Sam Houston Parkway E. Houston, TX 77032-3219  
Tel: 713-839-4929 • E-mail: Kateri.noel@halliburton.com

Deputy Director,  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
Mail Stop O-4E21  
11555 Rockville Pike  
Rockville, Maryland 20852

July 17, 2023

**RE: Application for License for the Export of Americium-241, Americium-241/Beryllium, Cobalt 60 and Cesium-137**

**HES3459**

Deputy Director,

Halliburton Energy Services, Inc. is applying for a license to export Category 2: **Americium-241, Americium-241/Beryllium, Cobalt 60 and Cesium-137** sources for shipments to Iraq. These materials will be used to provide logging and perforating services to Eriell Oilfield Services B.V., South Oil Company, and Lukoil Mid-East Limited clients of Halliburton Energy Services, Inc. (HES). These items are subject to the export-licensing jurisdiction of the U. S. Nuclear Regulatory Commission.

Sealed sources will always remain in the custody of Halliburton Worldwide Ltd., and when not in use, will be stored in a secure facility controlled by Halliburton Energy Services and its subsidiaries.

Halliburton Energy Services, Inc., in consideration of Title 10, Part 110.42 (c) of the Code of Federal Regulations, submits that the NRC-Controlled Items proposed for export are not inimical to the common defense and security of the United States and the proposed exports are consistent with the policies and objectives of the United States Government.

Included in this application please find a completed and signed copy of NRC Form 7, a copy of the Radioactive (RA) Source Control and Accountability, and a Schematic of storage facility.

If you should have any questions, please do not hesitate to call, or write at the above number or address.

Sincerely,

Kateri Noel  
Halliburton Law Department  
International Trade Compliance  
Phone: 713-839-4929  
Kateri.noel@halliburton.com

## **License Application and Request:**

The purpose of this license application is to request an RA Source license to export to Iraq.

This application is based on Halliburton Worldwide Ltd. business requirements to fulfill oil and gas service contract work.

The regulation requires the use of the 'sum of calculations' methodology for multiple or consolidated shipments. Halliburton has several RA sources that are less than the threshold but could exceed the limits if consolidated.

## **Scope of Work:**

Halliburton Energy Services, Inc. (HES) is one of the world's largest providers of products and services to the oil and gas industries. HES offers a broad array of products and services to upstream oil and gas customers worldwide. The Drilling and Formation Evaluation segment is primarily involved in drilling and evaluating the formations related to borehole construction and initial oil and gas formation evaluations and RA sources are a necessary element to the evaluation. RA sources will be used to provide logging and perforating services to our clients in Iraq.

## **Halliburton's Corporate Radiation Safety Program:**

Halliburton Energy Services, Inc. (HES), and Halliburton Worldwide Limited ensure compliance with radioactive source regulations by Company Policy and through the training, execution, and monitoring of our Corporate Radiation Safety Program (CRSP). The purpose of the CRSP program is to define and implement processes that minimize radiation exposure of personnel, property, and the environment resulting from working with radioactive materials and sources used by the company. Key areas covered by the program include:

- Organization and Authority Descriptions
- Radiation Safety Procedures Development and Maintenance
- Radiation Safety Training
- Radiation Exposure Control
- Procedures for Receipt, Handling, Identification, and Disposal of Radioactive Materials
- Radiological Emergencies and Incidents
- Radiation Protection Equipment Calibration and Maintenance
- Recordkeeping

It is the policy of Halliburton Energy Services, Inc. (HES) that the CRSP be executed both nationally and internationally. HES facilities located in countries with less restrictive regulations shall comply with this program as the minimum acceptable standard of radiation safety. A copy of these guidelines can be provided as required.

### **End User Authorization to Receive and Possess the Material:**

Halliburton Energy Services, Inc. (HES), subsidiary Halliburton Worldwide Limited will be the end users of these materials in Iraq.

Licensed materials will be stored at approved by Halliburton Energy Services, Inc. (HES), and its subsidiary Halliburton Worldwide Limited facilities only. All current facilities are licensed for use and storage as required by local and international law. All future facilities will also be licensed for use and storage as required by local and international law before exports or source are allowed.

The licensed materials shall be used by, or under the supervision and in the physical presence of the Halliburton Energy Service's Radiation Safety Officer, or individuals who have been trained as specified in Halliburton's materials license of individuals designated as users.

Random compliance audits check the effectiveness of each facility's radiation safety program maintenance while providing oversight by the Global Radiation Safety Group. The audit covers all major aspects of all the radioactive material usage. This audit is conducted by a Global Radiation Safety Officer (GRSO), and Associated Radiation Safety Officer (ARSO), a Region Radiation Safety Manager, or a qualified individual designated by a GRS).

### **Concern for Diversion:**

The RA sources authorized for export under this license will only be used by trained employees of Halliburton Energy Services, Inc., and trained employees of its subsidiaries.

Halliburton's Corporate Radiation Safety Program provides auditable processes for storage, usage, transportation, monitoring, and recordkeeping for all radioactive sources as well as training and internal management review to ensure the safety of the people and the environment.

All movements of radioactive sources are pre-screened, and approvals are required prior to shipment by the Radiation Safety Group and the International Trade Compliance Department.

The RA sources authorized for export will not be used for any nuclear activities or by any nuclear end users.

The commodities will not be resold without prior approval and notification as required by the NRC and local regulations.

Halliburton Energy Services, Inc. and its subsidiaries has consistently maintained, monitored, and reported to the Nuclear Regulatory Commission on all licenses related to the control of radioactive materials.