

ACCEPTANCE REVIEW MEMO

Licensee: Conoco Phillips Alaska, Inc.

License No.: 50-27783-01

Docket No.: 030-36627

Mail Control No.: 470611

Type of Action: Amend **Date of Requested Action:** 06-28-05

Reviewer Assigned: **Date Assigned to Reviewer:** 07-13-05

Reviewer(s) Who Performed Review: Cook-Montgomery

Response Received	Deficiencies Noted During Acceptance Review
	1. NOTE TO REVIEWER: Because this license was issued under NUREG 1556 Vol 4, an amendment is not necessary for the discontinuance for personnel dosimetry. Let the licensee know in the cover letter.
	2.
	3.
	4.

Reviewer's Initials: _____

Date: _____

Branch Chief's and/or SR. HP's Initials: _____

Date: _____

<input type="checkbox"/> Yes <input type="checkbox"/> No	Action - decommissioning notification should be issued within 30 days.
<input type="checkbox"/> Yes <input type="checkbox"/> No	Termination request < 90 days from date of expiration
<input type="checkbox"/> Yes <input type="checkbox"/> No	Action to be expedited
	____ Medical emergency
	____ Licensee in noncompliance (i.e. no RSO, location of use/storage not on license, radioactive material in possession not on license)
	____ National Security
	____ Other (_____)

Branch Chief's and/or Sr. HP's Initials: _____ **Date:** _____

SISP Review	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Non-Publicly Available, Sensitive if <u>any</u> item below is checked
	____ Radionuclides, forms, and quantities
	____ Location of RAM
	____ Building drawings with locations of RAM
	____ Security of RAM (locks, alarms, etc.)
	____ SS&D Catalog information
	____ Specifics of Emergency Plan (routes to and from RAM, response to security events, etc.)
	____ Safeguards Information

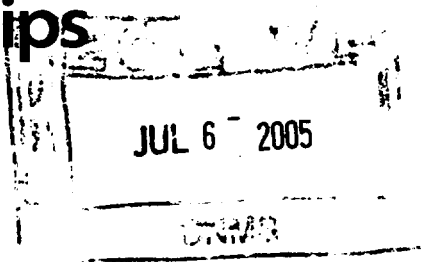
Branch Chief's and/or Sr. HP's Initials: QAC **Date:** 7/12/05



Diane K. Kobayashi, CIH
Industrial Hygienist
Health, Safety, Environment

P. O. Box 196105 (NSK-45)
Anchorage, AK 99519-6105
phone 907.659.7812
www.conocophillips.com
N1206@conocophillips.com

June 28, 2005



Certified Letter
7002 3150 0001 2321 4089

U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Subject: Fixed Gauge License No. 50-27783-01

To Whom It May Concern:

ConocoPhillips Alaska is requesting two amendments to the subject fixed gauge license which was issued for our Tracerco Profiler. The Profiler is installed on a flange on the Primary Test Separator in Central Processing Facility 1 (CPF1), Module 101, in the Kuparuk River Field.

1. Change of Radiation Safety Officer (RSO)

With your concurrence, Mr. Jeff Arveson to be replaced by Diane K. Kobayashi, 907/659-7812.

- Completed RSO training. See attached certificate and letter of approval from the American Board of Industrial Hygiene.
- Course was pre-approved by the State of Alaska Radiological Health by Mr. Clyde Pearce, 4500 Boniface Parkway, Anchorage, AK 99507-2107, 907/334-2107, clyde_pearce@health.state.ak.us.
- Course was presented by Mr. Steve Clark, Corporate Industrial Hygienist. See the attached resume which summarizes his qualifications and experience.
- Attached resume for Diane Kobayashi which summarizes professional experience.

2. Discontinuance of Personnel Dosimetry Program

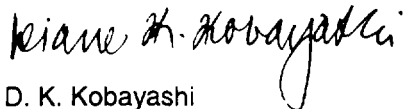
- A prospective evaluation assuming that the performance of a leak test by an Instrument Technician would be the worst case. Average time to perform the entire job task is 20 minutes; exposure at the flange is no more than background which is 0.01 – 0.03 mR/hr. Only two leak tests are required per year. Worst case exposure is approximately 0.018 mR (18 μ R) per year. With a quality factor of one, the expected dose is 0.018 mrem, which is less than 10% of the yearly whole body dose.
- Dosimetry for the month when the leak test was performed showed minimal exposure.
- Monitoring data from the inception of the program in late August, 2004, until the present indicate that the maximum dose to date is 15 mrem total.
- During a routine inspection by a representative of the NRC, discontinuance was suggested.

4 7 0 6 1 1

U. S. Nuclear Regulatory Commission
June 28, 2005
Page 2

Thank you for your consideration of this matter. If you require additional information, please call or e-mail the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "D. K. Kobayashi". The signature is written in a cursive style with a large, looped initial "D".

D. K. Kobayashi
Industrial Hygienist

Enclosures: 4

cc: CPF-1 Safety Specialist (electronic copy)
CPF-1 Production Supervisor (electronic copy)
NS HSE Supervisor (electronic copy)
Profiler Master Manual
File 7.11



Certificate of Completion

is hereby granted to:

Diane Kobayashi

for attendance of the

Radiation Safety Officer Training

October 28, 2004

American Board of Industrial Hygiene
(ABIH)

Certification Maintenance Points: 3.0

Approval #: 04-1386

A handwritten signature in black ink, appearing to read "Martin S. Clark", written over a horizontal line.

Martin S. Clark, CIH, CSP
Instructor

ABIH

american board of industrial hygiene

6015 West St. Joseph, Suite 102 Lansing, Michigan 48917 P: (517) 321-2638 F: (517) 321-4624 E: abih@abih.org

May 20, 2004

Martin S. Clark CIH, CSP
Conoco Phillips
12 AZ PB
Bartlesville, OK 74004

Dear Mr. Clark,

In response to your letter regarding ABIH certification maintenance points, ABIH has reviewed the material submitted and will award CM points to CIHs/CAIHs as follows:

Sponsor: ConocoPhillips
Activity: Radiation Safety Officer Training
Date: 2004 course offerings
CM Points: 3.0 Industrial Hygiene CM Points
Approval#: 04-1386

The above information can be listed on your CM Worksheet under the Meetings and Education Programs category.


Fundamental industrial hygiene courses and non-EHS management courses are capped at 5.0 CM points per course and 5.0 CM points per 5 year cycle. Distance learning activities are capped at 5.0 CM points per activity regardless of duration or content. Safety CM points are accrued toward the 40 CM point requirement and are not part of the minimum IH requirement. IH courses and conferences are counted toward the 10 point minimum requirement.

Verification for courses or educational programs must include the following: a certificate, letter, attendance roster or some other documentation from the sponsor verifying the completion of the entire course or educational program. Verification for conferences and meetings must include the following: local - attendance rosters, and/or a certificate, and/or a registration receipt; out of town - registration receipts and hotel/motel receipts, and/or approved expense vouchers.

We have included blank course point inquiry forms for your future use. If we can be of any further assistance or if you have additional questions, please contact me.

If we can be of any further assistance or if you have additional question, please contact the ABIH Office. A listing of approved courses, conferences and educational programs are listed at the ABIH web site (abih.org) in the certification maintenance section.

Sincerely,



Barbara A. Saalfeld
Administrative Assistant



Accredited by the Council of
Engineering and Scientific
Specialty Boards

Resume of:
Martin S. Clark, CIH, CSP



Education

- April 1994 Completed Radiation Safety Officer Course CPD 240,
Northwestern University Technological Institute.
- 1983-1986 University of Oklahoma Health Sciences Center. Degree:
Masters of Public Health-**Environmental Management**
Grade Point Average: 3.918
- 1974-1975 Hillcrest Medical Center-School of Medical Technology
Degree: Bachelor of Science-Medical Technology granted by
Oklahoma State University
- 1970-1974 Oklahoma State University. Degree: Bachelor of Science-
Microbiology

Work History

ConocoPhillips

11/1993-Present

Senior Industrial Hygienist - Corporate: Bartlesville, Oklahoma

- Corporate health and safety policy development.
- Corporate health and safety audit program.
- Corporate representation with trade associations and OSHA for regulatory advocacy.
- Provides leadership, direction, consultation, and implementation support for refining, E&P (domestic and international), Gas & Gas Liquids, Plastics, Chemicals, pipe manufacturing, Research & Development, Pipeline, and product stewardship.
- Radiation Safety Officer for Bartlesville and Ponca City Technical Centers.
- Provides technical training in radiation safety and industrial hygiene to field personnel. This provides a significant cost savings compared to outsourcing training requirements.
- Oversight of decommissioning of nuclear accelerator and radioactive waste disposal resulting in significant cost savings.
- Manager of ConocoPhillips Industrial Hygiene Laboratory with 3 direct reports.

Phillips Petroleum Company

9/1990-11/1993

Safety and Industrial Hygiene Representative – Phillips Research Center, Bartlesville

- Safety audits (fire protection, electrical, materials storage, etc.)

- Process reviews including Safety Representative for Hazardous Operations Analysis for Process Safety Management
- Review of new experimental protocols
- Accident investigations
- Participation in the Phillips Emergency Plan (PEP) for the PRC
- Participation in Community Awareness (CAER) Program
- Coordination of the Radiation Safety Program including source material, radon, NORM, training, and disposal of radioactive wastes
- Review of LASER operations for safe practices
- Provide consultation to the PRC Occupational Health Nurse on pulmonary function, audiometric, and other medical surveillance testing
- Interface with Corporate on Medical/Legal issues
- Assist with injury/illness management including determination of recordability
- Resource for engineering design of contaminant control ventilation
- Hot work and Entry permit authorization
- Evaluation of cases for TSCA section 8(c) and (e)

Saint Francis Hospital

7/1987-9/1990

Director of the Health, Environment, and Safety services.

- Directed internal health, environment, and safety program with two professional and one clerical report.
- Safety and Health consultant for outreach program to business and industry.
- Oversight of the asbestos program and contractors.
- Development of policies and programs, training, and instituting remedial and control measures.
- Consulting services to outside clients including: Allied Signal, Purolator Products Company (filter and motor components manufacturing), ChemLink Petroleum, Inc., PennWell Publishers and Allied Stamp Corporation (printing), Chief Chemical, Inc. (waste solvent recycling), Conley Corporation (plastic pipe manufacturing), Dean B. Knight Mfg. (welding and fabrication), HTB, Inc. (architectural firm).

Hillcrest Medical Center

1975-1987

Medical Technologist

- Analytical work in Chemistry, Hematology, and Blood Banking.
- Management of activities in Immunology/Radioimmunoassay.
- Education of Medical Technology students.
- Analytical method development.

Professional

- **Certified Industrial Hygienist (CIH)** in comprehensive practice by the American Board of Industrial Hygiene: December 1991

- **Certified Safety Professional (CSP)** in comprehensive practice by the Board of Certified Safety Professionals: August 1992.
- **Representative to the Oklahoma Radiation Management Advisory Council for the Petroleum Industry since 2001.**
- Member American Industrial Hygiene Association. Served on the Board of Directors for the Oklahoma Section of AIHA from 1990 through 1993.

Personal

Born:
Health:
Family:
Residence:



References available upon request.

Diane K. Kobayashi, CIH
P. O. Box 196105 (NSK-45)
Anchorage, AK 99519-6105
Business: (907)659-7812
E-mail: NSK Ind Hyg@conocophillips.com

PROFESSIONAL EXPERIENCE

October, 1988 – Present
ARCO Alaska, Inc. (AAI)
British Petroleum Alaska (BPA)
Phillips Petroleum Company
ConocoPhillips Alaska, Inc. (CPA)

Position: **Industrial Hygienist**

Responsible for assessing, measuring, and mitigating health and safety concerns for Company and contractor employees in a wide variety of concerns. Acts as Safety Officer and Site Safety Officer for IMT as needed, as a resource to the HAZMAT and Spill Response Teams, and as a Safety Specialist as needed.

- Developed and implemented the New Chemical Evaluation Procedure, Exposure Task Evaluation (ETE), Initial Emergency Response Sheets, Personal Protective Equipment Selection Guidelines, Reproductive Risk Evaluation. Worked with team to develop and implement policies and programs, including the Chemical Hygiene Plan, Physical Job Analysis (PJA), Respiratory Protection Program, Hearing Conservation Program, NORM, Lead Management, Hazard Communication, Asbestos Management, Personal Protective Equipment.
- Upgraded types of available personal protective equipment, including respiratory equipment, gloves, and hearing protection. Implemented quantitative respirator fit testing.
- Streamlined the SARA inventory process and coordinate the annual submittal to the regulatory agencies.

June, 1986 – September, 1988
Atlantic Richfield Company (ARCO)

Position: **Senior Safety and Industrial Hygiene Advisor**

Provided technical expertise and functional guidance to corporate management and operating companies in matters relating to employee exposure to physical, chemical, and biological agents and occupational safety. Participated in the development of both Company-wide policy and response to occupational health and safety related legislation and governmental rules and regulations. Represented the Company at various trade and professional organizations relating to occupational health and safety. Provided technical health and safety support to the Corporate Safety, Health, and Environmental auditing functions. Major activities:

- Developed the asbestos removal project's health and safety specifications for ARCO Plaza and managed program activities related to regulatory compliance, including contractor work practices, air monitoring, hazardous waste management, and medical surveillance. Supervised one industrial hygiene technician.
- Developed an industrial hygiene technical training manual for operating companies.
- Produced asbestos removal guidelines and training film for company-wide use.
- Coordinated company-wide efforts to meet the Superfund Amendments and Reauthorization Act such as consistent reporting methodology and tools for public relations efforts.
- Submitted one of the first personnel monitoring studies on MTBE to the US Environmental Protection Agency.
- Initiated and coordinated task force of Company representatives who reviewed and selected dispersion modeling computer program from 30+ choices.

January, 1981 – Atlantic Richfield Company (ARCO)
June, 1986 Four Corners Pipeline Company

Position: **Industrial Hygienist/Environmental Specialist**

Dual responsibility was held for environmental protection and employee health concerns in three operating districts located in five states. Existing and proposed legislation and regulations were analyzed for Company concerns to provide input to Corporate Public Affairs for development of Company positions, determined impact on Company operations, and formed recommendations and plans for compliance.

Environmental protection program responsibilities consisted of project review for environmental requirements, compilation of data for negotiation with regulatory agencies in federal, state, and local jurisdictions, and timely acquisition of permits. Program areas included air and water quality and solid and hazardous waste management. Major environmental activities:

- Obtained air and water quality permits and assured compliance with same associated with petroleum transportation and storage.
- Developed and implemented compliance plan for monitoring underground hazardous materials storage tanks.
- Developed hazardous waste management manuals which addressed sampling, characterization of wastes, and final disposition.
- Pursued recycling alternatives for petroleum-contaminated materials and delisting of crude oil.
- Resolved proper laboratory procedures to determine fuel oil vapor pressure by regulatory agency.

Industrial Hygiene responsibilities included the identification, evaluation, and measurement of potential occupational health hazards, recommendation of control measures, and assessment of the effectiveness of the corrective actions. Major industrial hygiene activities:

- Developed a hazardous materials management program which included procedures for purchasing, storage and handling, labeling, and training to meet Hazard Communication Rule requirements.
- Implemented the Atlantic Richfield Company Assess and Control Exposure (ACE) program by completion of chemical inventories, performance of exposure task evaluations, and measurement of exposure to various potential health hazards such as noise, hydrocarbons, radiation, and hydrogen sulfide.
- Represented ARCO Transportation Company on the Corporate committee on the assessment of benzene and the creation of a company-wide computer documentation system.

August, 1974 – Santa Barbara County Health Care Services
December, 1980 Environmental Health

Position: **Environmental Health Specialist (Physical/Chemical Hazards)**

Technical specialist for Environmental Health programs in noise control, solid waste management, infectious and hazardous materials, occupational health, disaster planning, and radiological health. Performed investigations and special studies, conducted research, evaluated data and made recommendations, and acted as an expert consultant to agencies and industries in Santa Barbara County and its cities. Acted as Environmental Health representative in all emergencies involving hazardous materials, providing safety data and supervising cleanup operations. Was County Noise Advisor.

Position: **Environmental Health Officer**

Performed general Environmental Health responsibilities such as public health investigations and consultations as they related to domestic water supplies; wastewater systems; substandard housing and institutional facilities; organized camps, food producing, distributing and serving establishments; vector control; and recreational facilities. Promoted to Environmental Health Specialist.

JUL 15 2005
DATE

This is to acknowledge the receipt of your letter/application dated 6-28-05, and to inform you that the initial processing, which includes an administrative review, has been performed.

There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 470611.
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,



Licensing Assistant

BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

(FOR LFMS USE)

 INFORMATION FROM LTS

Program Code: 03120
 Status Code: 0
 Fee Category: 3P
 Exp. Date: 20140831
 Fee Comments:
 Decom Fin Assur Req'd: N

LICENSE FEE TRANSMITTAL

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: CONOCO PHILLIPS ALASKA, INC.
 Received Date: 20050706
 Docket No: 3036627
 Control No.: 470611
 License No.: 50-27783-01
 Action Type: Amendment

2. FEE ATTACHED

Amount: _____
 Check No.: _____

3. COMMENTS

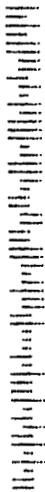
Signed *Phillips*
 Date *7/6/05*

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / __/)

1. Fee Category and Amount: _____
2. Correct Fee Paid. Application may be processed for:
 Amendment _____
 Renewal _____
 License _____
3. OTHER _____

Signed _____
 Date _____

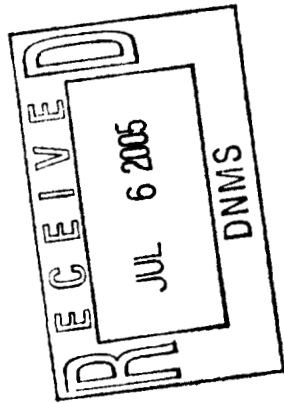
Cor
P.O.
Anc



ConocoPhillips



CERTIFIED MAIL™
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE



U.S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064