

**From:** [Chimood, Jane](#)  
**To:** [OIP Notifications Resource](#)  
**Subject:** FW: RE: RE: Self-Disclosed notification violation of import regulations in 10 CFR 110.50(c)(3)(ii)  
**Date:** Wednesday, June 12, 2019 2:51:36 PM  
**Attachments:** [US Import Requirements.docx](#)

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**From:** Elrod, Jim K <james.elrod@bhge.com>  
**Sent:** Wednesday, May 15, 2019 8:29 AM  
**To:** Baker, Stephen <Stephen.Baker@nrc.gov>  
**Cc:** Chimood, Jane <Jane.Chimood@nrc.gov>  
**Subject:** [External\_Sender] RE: RE: Self-Disclosed notification violation of import regulations in 10 CFR 110.50(c)(3)(ii)

Stephen,  
I appreciate your input and will work toward the same goal. I did make further adjustments to the US import requirements document as suggested. ( good catch on the date thing. I should have caught that)

I personally, and as the representative for Baker Hughes, want to always do my best with handling this type issue and always appreciate your input. The attached latest revision refers direct to the notification required for  
Cat 2 or above imports.

If I have not used the correct official name for your agency please let me know and I will make the adjustment. Sometimes agency names are so long I could have made an error.

I hope we can avoid further escalation of this. I know Customs and other organizations don't like surprises and the notifications required for Category 1 or 2 shipments being imported or exported should be adhered to.

Last but not least, I apologize if some of my responses have not been at the appropriate level of diplomacy. No excuse is acceptable, but I personally have had a difficult start to the new year. I will strive to make the attitude adjustments necessary so I can get back to my normal and better view on things. I have worked with you so much over the years, it has been a pleasant experience.

Any other suggestions on adjustments needed on our process would be appreciated.

**Jim Elrod**

Radiation Safety Officer/Coord/Supervisor II  
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**PRE-ALERT REQUIREMENTS FOR ALL SHIPMENTS TO THE U.S. INCLUDING DATA  
REQUIRED FOR IMPORTER SECURITY FILING**  
**(Rev. May 2019)**

- **Notify Party:** Add this information to the Notify Party block on all air way bills and ocean bills of lading inbound to the US (excludes courier shipments):

*Expeditors International  
18255 Humble Parkway  
Humble, TX 77338  
281-913-2800  
Attention: Baker Hughes Account Rep*

- **Pre-Alerts:** Pre-alerts including scanned documentation identified in the *U.S. Standard Shipping Instructions* **MUST** be sent for every shipment consigned to Baker Hughes Product Lines anywhere in the U.S. to the e-mail addresses below according to mode of transportation:

**All Ocean and Air Shipments**

[onelogisticsusaimportop@bakerhughes.com](mailto:onelogisticsusaimportop@bakerhughes.com)  
and  
[iah-baker.hughes@expeditors.com](mailto:iah-baker.hughes@expeditors.com)

**Truck Shipments from Mexico – same as above**

**All Truck Shipments from Canada:**

[onelogisticsusaimportop@bakerhughes.com](mailto:onelogisticsusaimportop@bakerhughes.com)  
and [borderprealerts@expeditors.com](mailto:borderprealerts@expeditors.com)

**All Courier Shipments (only use FedEx or DHL Express):**

[onelogisticsusaimportop@bakerhughes.com](mailto:onelogisticsusaimportop@bakerhughes.com)  
And either  
DHL Express: [bakerhughescvgteam@dhl.com](mailto:bakerhughescvgteam@dhl.com)  
or  
FedEx: [BUFCPAMAIN\\_B@ftn.fedex.com](mailto:BUFCPAMAIN_B@ftn.fedex.com); and [kenneth\\_martin@ftn.fedex.com](mailto:kenneth_martin@ftn.fedex.com)

- **Pre-alert Subject Line Format:**

Pre-alert subject line to include transport mode, SAP Shipment Number or Invoice Number, and other relevant data needed. **Radioactive shipments subject line must begin with word "Radioactive"**. Courier subject line must start with BK to identify Baker shipment and include the air bill tracking number:

Examples for Subject Line (vendors use PO# instead of Shipment#)

Air, Shipment #1528114

Ocean, Shipment #1528114

Truck, Shipment #1528114

Prealert: BK Courier, Shipment #1528888, air bill tracking no.

Radioactive, Shipment #1528888



**The requirements below in red are for radioactive shipments only.**

- **MANDATORY:** 10 day prior to shipment notification must be sent to Jim Elrod or Rick Rice for determination on whether a US NRC notification is required prior to shipment.
  - If applicable notification will be sent to US NRC Office of International Programs at the following email address: [hoo.hoc@nrc.gov](mailto:hoo.hoc@nrc.gov)
  - Approval to ship will then be given to exporting location.
- A copy of their approval must be included with Green Light Approval request and pre-alert.
- Pre- alert must contain Flight Number, ETD origin, and ETA destination.
- **Radioactive sources include “RADIOACTIVE” in email subject line**
  - In addition to above distribution, copy Jim Elrod: [james.elrod@bakerhughes.com](mailto:james.elrod@bakerhughes.com) and Ricky Rice : [ricky.rice@bakerhughes.com](mailto:ricky.rice@bakerhughes.com)

**OCEAN Freight/ ISF (10+2) Requirements –**  
**Potential penalty for failure to comply:**  
 To be compliant with US Customs regulations for ISF the following must be emailed to the same pre-alert contacts preferably 72 hrs (minimum 48 hours) prior to departing from origin.

Pre-alert must contain the below:

- House B/L and/or Master B/L
- Commercial Invoice
- Packing list
- Mill Certificates if required. (stated in the US Shipping requirements)
- ISF form with full details completed

**ALERT: U.S. CUSTOMS IS ENFORCING TIMELY IMPORTER SECURITY FILING BY IMPOSING PENALTIES. PENALTIES IMPOSED DUE TO SHIPPING LOCATION NOT ADHEREING TO THESE REQUIREMENTS WILL BE RESPONSIBLE FOR THE PENALTIES INCURRED.**

U.S. IMPORT OPERATIONS & C-TPAT			
NAME	TITLE	OFFICE PHONE	E-MAIL
Laura Arrambide	Logistics Analyst - U.S Imports	713 879-2140	<a href="mailto:laura.arambide@bakerhughes.com">laura.arambide@bakerhughes.com</a>
Ruby Medrano	Logistics Analyst - U.S. Imports	713 879-2157	<a href="mailto:ruby.medrano@bakerhughes.com">ruby.medrano@bakerhughes.com</a>
Ryan Frazier	Logistics Analyst - U.S. Imports	713 879-2726	<a href="mailto:ryan.frazier@bakerhughes.com">ryan.frazier@bakerhughes.com</a>
Julie Obecanov	C-TPAT Logistics Manager	713-879-2197	<a href="mailto:julie.obecanov@bakerhughes.com">julie.obecanov@bakerhughes.com</a>
Zettie Eversole	U.S. Import Manager	713 879-2136	<a href="mailto:zettie.eversole@bakerhughes.com">zettie.eversole@bakerhughes.com</a>

- **expo:** Shippers wanting to obtain an Expeditors **expo** account for visibility to BH shipment status and documentation via the web using BH reference #s. To secure an account, use the “Register” feature at: <http://expox.expeditors.com/expo/Login.jsp?status=default&browserVersion=ie4up>.