
Commonwealth of Kentucky Radiation Protection Regulatory Guide



Guidance for Wire Line Service Operations

**Kentucky Department of Public Health
Radioactive Materials Program
275 East Main Street, Mail Stop HS1C-A
Frankfort, KY 40601
Phone: (502) 564-3700
<http://www.chfs.ky.gov/dph/radioactive.htm>**

EXECUTIVE SUMMARY

Kentucky Regulatory Guides (**KYREGS**) are issued to describe and make available to the applicant or licensee, acceptable methods of implementing specific parts of **902 KAR 100, 'Kentucky Radiation Protection Regulations'**, to delineate techniques used by the staff in evaluating past specific problems or postulated accidents, and to provide guidance to applicants, licensees, or registrants. KYREGS are not substitutes for **902 KAR 100, 'Kentucky Radiation Protection Regulations'**, therefore, compliance with them is not required. Methods and solutions different from those set forth in this guide will be acceptable if they provide a basis for the Kentucky Department of Health (KDPH), Radioactive Materials Program, to determine if a radiation protection program meets the current rule and protects health and safety.

Comments and suggestions for improvements in this KYREGS are encouraged and it will be revised, as appropriate, to accommodate comments and to reflect new information or experience. Comments should be sent to: **Kentucky Department for Public Health, Radiation Health Branch, 275 East Main Street Mailstop HS1C-A Frankfort, KY 40621.**

Requests for single copies of this guide (which may be reproduced) can be made in writing to: Kentucky Department of Health, Radioactive Materials Program, Radiation Health Branch, 275 East Main Street Mailstop HS1C-A Frankfort, KY 40621,. This guide is also available on our website:

<http://chfs.ky.gov/dph/radiation.htm>

These KYREGS, 'Guidance for Wire Line Service Operations', have been developed to streamline the application process for a Well Logging, Tracer, and Field Flood Study license. A copy of the KDPH form, 'Application for a Radioactive Material License Authorizing the Use of Material in Wire Line Service Operations, is located in **Appendix A** of this guide. **Appendices C-U** provide examples, models, and additional information that can be used when completing the application.

It typically takes 60-90 days for a license to be processed and issued if the application is complete. When submitting the application be sure to include the appropriate application fee listed in **902 KAR 100:012**.

In summary, the applicant will need to do the following to submit an application for a well logging, tracer, or field flood study license:

- Use this regulatory guide to prepare the KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in Well Logging, Tracer, and Field Flood Study’ (**Appendix A**).
- Complete the KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in ‘Wire Line Service Operations’ (**Appendix A**). See ‘Contents of Application’ of the guide for additional information.
- Include any additional attachments:
 - All supplemental pages should be on 8 ½” x 11” paper.
 - Please identify all attachments with the applicant’s name and license number (if a renewal).
- Avoid submitting proprietary information unless it is absolutely necessary;
- Submit an original signed application along with attachments (if any).
- Submit the application fee (for new licenses only).
- Retain one copy of the licensee application and attachments (if any) for your future reference. You will need this information because the license will require that radioactive material be possessed and used in accordance with statements, representation, and procedures provided in the application and supporting documentation.

If you have any questions about the application process please contact this office at (502) 564-3700.

CONTENTS

Executive Summary	2
Contents	4
List of Appendices	5
List of Tables	6
List of Figures	6
Abbreviations	7
Purpose of Guide.....	9
Licenses.....	11
The ‘As Low As Reasonably Achievable (ALARA)’ Concept.....	12
Who Regulates Facilities in the Commonwealth of Kentucky?	13
Management Responsibility	14
Applicable Rule	15
How to File	16
Where to File	17
License Fees.....	18
Contents of Application	
Type of Application	19
Item 1. Name and Mailing Address of Applicant	19
Item 2. Street Address Where Radioactive Material Will be Used	20
Item 3. Telephone Number	21
Item 4. Person to be Contacted and Listed as the Contact Person.....	21
Radiation Safety Officer, Logging Supervisors and Logging Assistants	
Item 5 & 13 . Training for Logging Supervisors, Logging Assistants, and Tracer/Field Flood Study Users.....	21
Item 6. . Radiation Safety Officer (RSO)	22
Radioactive Material	
Item 7. Radioactive Material and Authorized Use.....	24
Item 7.1 Purposes for Which Licensed Material will be Used.....	28
Radiation Detection	
Item 8 & 9 . Radiation Detection instrumentation and Calibration of Radiation Detection Instrumentation.....	30
Item 10. Personnel Monitoring Devices	31
Item 11. Facilities and Equipment.....	33
Item 11.1 Minimization of Contamination.....	34
Radiation Safety Program	
Item 12. Radiation Protection Program.....	35
Item 12.1. Well Owner/Operator Agreements.....	36
Item 12.2. Radiation Safety Program Audit	39
Item 12.3. Termination of Activities	39
Item 12.4. Material Receipt and Accountability	41
Item 12.5. Financial Assurance and Record Keeping for Decommissioning	42
Item 12.6. Leak Tests	43
Item 12.7. Public Dose	45
Item 12.8. Maintenance	46
Item 12.8.1. Daily Maintenance.....	47
Item 12.8.2. Semi-Annual Inspection and Routine Maintenance	47
Item 12.8.3. Maintenance Requiring Special Authorization.....	48
Item 12.9. Operating and Emergency Procedures	49
Item 12.10. Transportation	50

Item 12.11. Wire Line Service Operations	51
Item 12.11.1. Drill-To-Stop Large Sealed Sources	51
Item 12.11.2. Measurement While Drilling \ Logging While Drilling	52
Item 12.11.3. Energy Compensation Sources	52
Item 12.11.4. Use of Sealed Sources or Neutron Generators in Fresh Water Aquifers.....	53
Item 12.11.5. Tracer Studies in Single Well Applicators	53
Item 12.11.6. Field Flood and Secondary Recovery Applications (Tracer Studies in Multiple Wells)	54
Item 12.11.7. Tracer Studies in Fresh Water Aquifers	55
Item 12.11.8. Radioactive Collar and Subsidence or Depth Control Markers	56
Item 12.11.9. Neutron Accelerators Using Licensed Material	56
Item 12.11.10. Depleted Uranium Sinker Bars	57
Item 14. Waste Management	59
Fees and Certification	
Item 15. Certification	63

LIST OF APPENDICES

Appendix A	KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in Well Logging, Tracer, and Field Flood Study’	65
Appendix B	KDPH form, ‘Certificate of Disposition of Material’	68
Appendix C	Sample Delegation of Authority to Radiation Safety Officer Letter	70
Appendix D	Sample Signature authorization Letter.....	72
Appendix E	Transfer of Control Information	74
Appendix F	Field Flood Studies/Enhanced Recovery of Oil and Gas Wells	78
Appendix G	Typical Duties and Responsibilities of Radiation Safety Officer	82
Appendix H	Suggested Well Logging and Field Flood Audit Checklist	85
Appendix I	Guidance on Decommissioning Funding Plan and Financial Assurance	92
Appendix J	NRC Letter Dated August 10, 1989: Transmitting Temporary Generic Exemptions to Well Logging Licensees	95
Appendix K	Well Logging Supervisor and Logging Assistant Training Requirements	104
Appendix L	Annual Internal Job Performance Inspection Checklist for Well Logging Supervisors and Well Logging Assistants	108
Appendix M	Radiation Monitoring Instrument Specifications and Model Survey Instrument Calibration Program	110
Appendix N	Guidance for Demonstrating that Unmonitored Individuals are Not Likely to Exceed 10 Percent of the Allowable Limits	115
Appendix O	Guidance for Demonstrating that Individual Members of the Public will not Receive Doses Exceeding the Allowable Limits	117
Appendix P	Notification of Proper Persons in the Event of an Accident.....	123
Appendix Q	Model Leak Test Program	126
Appendix R	Transportation.....	129
Appendix S	Procedures for Waste Management	138
Appendix T	Well Owner/Operator Agreement.....	144
Appendix U	Actions to be Taken if a Sealed Source is Ruptured.....	147

LIST OF TABLES

Table 1	Who Regulates the Activity?	13
Table 2	Radiation Safety Officer Duties and Authorities	23
Table 3	Types of Radioactive Materials Used in Field Flood Studies and Single Well Tracer Operations	27
Table 4	Sample Format for Providing Information About Requested Radioisotopes	29
Table 5	Occupational Dose Limits for Adults	31
Table 6	Acceptable License Termination Screening Values of Common Radionuclides for Building Surface Contamination.....	41
Table 7	Commonly Used Licensed Materials Requiring Financial Assurance/Decommissioning Funding Plan	43
Table 8	Isotopes With Half-lives Greater Than or Equal to 120 Days	93
Table 9	Sample Worksheet for Determining Need for a Decommissioning Funding Plan or Financial Assurance	94
Table 10	902 KAR 100:142 Training Requirements	105
Table 11	Typical Survey Instrumentation.....	111
Table 12	Calculation Method, Part 1: Hourly and Annual Doses Received from a Logging Source Stored in Above Ground Transportation Container.....	121
Table 13	Calculation Method, Part 2: Annual Dose Received from a Logging Source Stored in Above Ground Transportation Container	122
Table 14	KDPH Notifications	124

LIST OF FIGURES

Figure 1	Examples of Sealed Sources Used In Well Logging Operations.....	26
Figure 2	Features of a Typical Source Abandonment.....	37
Figure 3	Permanent Identification Plaque	38
Figure 4	Bird's Eye View of Office	118
Figure 5	Downhole Storage Array	120

ABBREVIATIONS

ALARA	As Low As is Reasonably Achievable
ALI	Annual Limit on Intakes
ANSI	American National Standards Institute
bkg	Background
BPR	Business Process Redesign
Bq	Becquerel
cc	centimeter cubed
CDE	Committed Dose Equivalent
CEDE	Committed Effective Dose Equivalent
Ci	Curie
CFR	Code of Federal Regulations
cm ²	centimeter squared
cpm	counts per minute
C/kg	Coulombs/Kilogram
cpm	Counts Per Minute
DFP	Decommissioning Funding Plan
DIS	Decay-In-Storage
DOE	United States Department of Energy
DOT	United States Department of Transportation
dpm	Disintegrations Per Minute
DTS	Drill-To-Stop
EA	Environmental Assessment
ECS	Energy Compensation Source
EDE	Effective Dose Equivalent
EPA	United States Environmental Protection Agency
F/A	Financial Assurance
FDA	United States Food and Drug Administration
FR	Federal Register
GM	Geiger-Mueller
GBq	Gigabecquerel
IN	Information Notice
KAR	Kentucky Administrative Regulations
KDPH	Kentucky Department of Health
KYREGS	Kentucky Regulatory Guides
LLW	Low Level Waste
LSA	Low Specific Activity
LWD	Logging While Drilling
MBq	Megabecquerel
MC	Manual Chapter
mCi	millicurie
mGy	Milligray
mR	Milliroentgen
mrem	Millirem
mSv	Millisievert
MWD	Measurement While Drilling
NCRP	National Council on Radiation Protection and Measurements
NIST	National Institute of Standards and Technology
NMSS	Office of Nuclear Material Safety and Safeguards
NORM	Naturally-Occurring Radioactive Material

NRC	United States Nuclear Regulatory Commission
NVLAP	National Voluntary Laboratory Accreditation Program
OSL	Optically Stimulated Luminescence
QA	Quality Assurance
R	Roentgen
RG	Regulatory Guide
RQ	Reportable Quantities
RSO	Radiation Safety Officer
SDE	Shallow Dose Equivalent
SI	International System of Units (abbreviated SI from the French Le Systeme Internationale d'Unites)
SSD	Sealed Source and Device
SSDR	Sealed Source and Device Registration
std	Standard
Sv	Sievert
T1/2	Half-life
TAR	Technical Assistance Request
TEDE	Total Effective Dose Equivalent
TI	Transportation Index
TLD	Thermoluminescent Dosimeters
USASI	United States of America Standards Institute
USC	United States Code
USDA	United States Department of Agriculture
μCi	microcurie
%	percent

PURPOSE OF GUIDE

This document provides guidance to an applicant in preparing a license application for well logging, tracer, and field flood study. It also provides guidance on KDPH's criteria for evaluating a well logging, tracer and field flood study license application. It is not intended to address the commercial aspects of manufacturing, distribution, and service of sources in devices. Byproduct material, depleted uranium, and special nuclear material, as defined in **902 KAR 100:010**, are used for a variety of purposes to include well logging and tracer applications involving both single or multiple well bores; conventional well logging and tracer operations; and, in some cases, research and development. Examples include the following applications:

- Sealed sources are used in cased and uncased boreholes
- Tracer materials are used in single well applications
- Tracer materials are used in multiple well applications (field flood study) for enhanced recovery of oil and gas wells
- Sealed sources are used for calibration of applicant's survey instruments and well logging tools
- Sealed sources and tracer materials are used in the research and development of new techniques and equipment.

This guide identifies the information needed to complete KDPH RPS-7 form 'Application for a Radioactive Material License Authorizing the Use of Material in Wire Line Service Operations (**Appendix A**).

The format for each item number in this guide is as follows:

- **Rule** - references the requirements from **902 KAR 100 'Kentucky Radiation Protection Regulations'** applicable to the item;
- **Criteria** - outlines the criteria used to judge the adequacy of the applicant's response;
- **Discussion** - provides additional information on the topic sufficient to meet the needs of most readers, and
- **Response from Applicant** – shows the appropriate item on the application and provides: response(s), offers the option of an alternative response, or indicates that no response is needed on that topic.

The information submitted in the application must be sufficient to demonstrate that proposed equipment, facilities, personnel, and procedures are adequate to protect the health and safety of the citizens of the Commonwealth of Kentucky in accordance with the agency's guidelines. Submission of incomplete or inadequate information will result in delays in the approval process for the license. Additional information will be requested when necessary to ensure that an adequate radiation safety program has been established. Such requests for additional information will delay completion of the application's review and may be avoided by a thorough study of the rule and these instructions prior to submitting the application.

902 KAR 100 'Kentucky Radiation Protection Regulations' requires the applicant and/or licensee to develop, document, and implement procedures that will ensure compliance with the rule. The appendices describe radiation protection procedures. Each applicant should read the rule and procedures carefully and then decide if the procedure addresses specific radiation protection program needs at the applicant's facility. Applicants may adopt a procedure included in this KYREGS or they may develop their own procedures to comply with the applicable rule.

In this guide, "dose" or "radiation dose" means absorbed dose, dose equivalent, effective dose equivalent, committed dose equivalent, committed effective dose equivalent, or total effective dose equivalent (TEDE). These terms are defined in the **902 KAR 100:010**. Rem and Sievert (Sv), its SI equivalent (1 rem = 0.01 Sv), are used to describe units of radiation exposure or dose. These units are used because **902 KAR 100:019 'Kentucky Radiation Protection Regulations', 'Standards for Protection Against Radiation'**, sets dose limits in terms of rem, not rad or roentgen. A useful rule of thumb is an exposure of 1 roentgen is equivalent to an absorbed dose of 1 rad and dose equivalent of 1 rem.

These KYREGS provide the latest guidance and is modeled on the Nuclear Regulatory Commission's (NRC) NUREG 1556, Volume 14. The KYREGS shows the requirements in terms of the **902 KAR 100 'Kentucky Radiation Protection Regulations'** and provides a user-friendly format to assist with the preparation of a well logging, tracer and field flood study license application.

LICENSES

Applicants should study this document, related guidance, and all applicable regulations carefully before completing the KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in Well Logging, Tracer, and Field Flood Study’. KDPH expects licensees to provide requested information on specific aspects of their proposed radiation protection program in attachments to the application. When necessary, KDPH may ask the applicant for additional information to gain reasonable assurance that an adequate radiation protection program has been established.

After a license is issued, the licensee must conduct its program in accordance with the following:

- Statements, representations, and procedures contained in the application and in correspondence with KDPH;
- Terms and conditions of the license; and
- **902 KAR 100 ‘Kentucky Radiation Protection Regulations’.**

THE ‘AS LOW AS IS REASONABLY ACHIEVABLE (ALARA)’ CONCEPT

902 KAR 100, Radiation protection programs, states that “*each licensee shall develop, document, and implement a radiation protection program commensurate with the scope and extent of licensed activities*” and “*the licensee shall use, to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are...ALARA.*” This section also requires that licensees review the content of the radiation protection program and its implementation annually.

Information directly related to radiation protection standards in **902 KAR 100:019 ‘Kentucky Radiation Protection Regulations’, Standards for Protection Against Radiation’**, is contained in:

- NRC’s NUREG-1736, ‘Consolidated Guidance: 10 CFR Part 20 - Standards for Protection Against Radiation’.

Applicants should consider the ALARA philosophy detailed in these reports when developing plans to work with licensed radioactive materials.

WHO REGULATES FACILITIES IN THE COMMONWEALTH OF KENTUCKY?

In the special situation of work at federally controlled sites in the Commonwealth of Kentucky, it is necessary to know the jurisdictional status of the land in order to determine whether the Nuclear Regulatory Commission (NRC) or KDPH has regulatory authority. The NRC has regulatory authority only over land determined to be “exclusive federal jurisdiction,” while KDPH has jurisdiction over non-exclusive federal jurisdiction land (see **Table 1**). Applicants and licensees are responsible for finding out, in advance, the jurisdictional status of the specific areas where they plan to conduct licensed operations. KDPH recommends that applicants and licensees ask their local contact for the federal agency controlling the site (e.g., contract officer, base environmental health officer, district office staff) to help determine the jurisdictional status of the land and to provide the information in writing, so that licensees can comply with NRC or KDPH regulatory requirements, as appropriate. The following table lists examples of regulatory authority.

Table 1: Who Regulates Activity?

Applicant and Proposed Location of Work	Regulatory Agency
Federal agency regardless of location (except that Department of Energy [DOE] and, under most circumstances, its prime contractors are exempt from licensing [10 CFR 30.12])	NRC
Non-federal entity in non-Agreement State, U.S. territory, or possession	NRC
Non-federal entity in Kentucky at non-federally controlled site	KDPH
Non-federal entity in Kentucky at federally-controlled site not subject to exclusive Federal jurisdiction	KDPH
Non-federal entity in Kentucky at federally-controlled site subject to exclusive federal jurisdiction	NRC

A current list of Agreement States (states that have entered into agreements with the NRC that give them the authority to license and inspect radioactive material used or possessed within their borders), including names, addresses, and telephone numbers of responsible officials are maintained by the NRC Office of Federal and State Materials and Environmental Management Programs and is available on their website: <http://nrc-stp.ornl.gov/>.

MANAGEMENT RESPONSIBILITY

KDPH endorses the philosophy that effective radiation protection program management is vital to safe operations that comply with KDPH regulatory requirements.

“Management” refers to the chief executive officer or other individual having the authority to manage, direct, or administer the licensee’s activities or that person’s delegate or delegates.

To ensure adequate management involvement, a management representative (i.e., chief executive officer or delegate) must sign the submitted application acknowledging management’s commitments to and responsibility for the following:

- Radiation protection, security and control of radioactive materials, and compliance with rule;
- Knowledge about the contents of the license application;
- Compliance with current KDPH and United States Department of Transportation (DOT) regulations and the licensee’s operating and emergency procedures;
- Provision of adequate resources (including space, equipment, personnel, time, and, if needed, contractors) to the radiation protection program to ensure that the public, and workers are protected from radiation hazards;
- Appointment of a qualified individual who has agreed in writing to work as RSO;

Management may delegate individuals (i.e., an RSO or other designated individual) to submit amendment requests to KDPH. A correspondence delegation letter must be completed, signed by management and submitted to KDPH. A sample letter has been included in **Appendix D**

APPLICABLE RULE

It is the applicant's or licensee's responsibility to obtain, read, and follow **902 KAR 100, 'Kentucky Radiation Protection Regulations'**.

The following parts of **902 KAR 100, 'Kentucky Radiation Protection Regulations'** contain regulations applicable to well logging, tracer, and field flood study licensees:

- Part 015 'General Provisions'
- Part 019 'Standards for Protection Against Radiation'
- Part 040 'General Provisions for Specific Licenses'
- Part 165 'Notices, Instructions, and Reports to Workers; Inspections'
- Part 070 'Transportation of Radioactive Material'
- Part 142 'Radiation Safety Requirements for Wireline Service Operations and Subsurface Tracer Studies'

Requests for single copies of the above documents (which may be reproduced) can be made in writing to: Kentucky Department of Public Health, Radioactive Materials Program, 275 East Street, mail Stop HS1C-A, Frankfort KY 40621 or for an electronic copy go to our web site at: <http://chfs.ky.gov/dph/radiation.htm>.

HOW TO FILE

Applicants for a materials license should do the following:

- Be sure to use the most recent guidance from KDPH in preparing an application.
- Complete KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in Well Logging, Tracer, and Field Flood Study’ (**Appendix A**).
- For each separate sheet that is submitted with the application, identify and key it to the item number on the application or the topic to which it refers.
- Submit all documents on 8-1/2 x 11 inch paper.
- Avoid submitting proprietary information unless it is necessary
- Submit an original, signed application.
- Retain one copy of the license application for future reference.

Deviations from the suggested wording of responses as shown in this KYREGS or submission of alternative procedures will require a more detailed review.

Note: Personal employee information (i.e.; home address, home telephone number, Social Security Number, date of birth and radiation dose information) should not be submitted unless specifically requested by KDPH.

WHERE TO FILE

Applicants wishing to possess or use radioactive material in the Commonwealth of Kentucky are subject to the requirements of **902 KAR 100 ‘Kentucky Radiation Protection Regulations’** and must file a license application with:

**Kentucky Department of Public Health
Radioactive Materials Program
275 East Main Street, Mail Stop HS1C-A
Frankfort, KY 40601
Phone: (502) 564-3700**

LICENSE FEES

The appropriate fee must accompany each application or license amendment request. Refer to **902 KAR 100:012** to determine the amount of the fee. KDPH will not issue the new license prior to fee receipt. An application for a new license or an amendment to an existing license requesting authorization to conduct field flood studies requires that an environmental assessment be performed. Full cost of this fee is assessed by the professional staff. Once technical review begins, no fees will be refunded. Application fees will be charged regardless of KDPH's disposition of an application or the withdrawal of an application.

Licensees are also subject to annual fees; refer to **902 KAR 100: 012**.

Direct all questions to: Kentucky Department of Public Health, Radioactive Materials Program, 275 East Main Street, Mailstop HS1C-A, Frankfort KY 40621.

CONTENTS OF AN APPLICATION

Type of Application

On the application, check the appropriate box and, if appropriate, note the license number.

Response from Applicant:

New License ⁽¹⁾ Check. _____	Amendment in Entirety ⁽¹⁾ of License No. _____	Amendment to ^(2, 3) License No. _____	Renewal of ^(2, 3) License No. _____
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Item 1: Name and Mailing Address of Applicant

List the legal name of the applicant's corporation or other legal entity with direct control over use of the radioactive material. A division or department within a legal entity may not be a licensee. An individual may be designated as the applicant only if the individual is acting in a private capacity and the use of the radioactive material is not connected with employment in a corporation or other legal entity. Provide the mailing address where correspondence should be sent. A Post Office box number is an acceptable mailing address.

Notify the agency of changes in mailing address.

Response from Applicant:

1. Applicant's Name and Mailing Address

Note: The agency must be notified in the event of change of ownership or control and bankruptcy proceedings, see below for more details.

Timely Notification of Transfer of Control (Appendix E)

Rule: 902 KAR 100:040

Criteria: Licensees must provide full information and obtain the KDPH's **prior written consent** before transferring control of the license, or, as some licensees call it, 'transferring the license'.

Discussion: Transfer of control may be the result of mergers, buyouts, or majority stock transfers. Although it is not KDPH's intent to interfere with the business decisions of licensees, it is necessary for licensees to obtain prior KDPH written consent before the transaction is finalized. This is to ensure the following:

- Radioactive materials are possessed, used, or controlled only by persons who have valid licenses issued by KDPH, NRC, or another Agreement State;
- Materials are properly handled and secured;
- Persons using these materials are competent and committed to implementing appropriate radiological controls;
- A clear chain of custody is established to identify who is responsible for the disposition of records and licensed materials;

- Public health and safety are not compromised by the use of such materials.

Response from Applicant: None at time of application.

Notification of Bankruptcy Proceedings

Regulation: 902 KAR 100:040 (4)

Criteria: Immediately following filing of voluntary or involuntary petition for bankruptcy, the licensee must notify KDPH, in writing, identifying the bankruptcy court in which the petition was filed and the date of filing.

Discussion: Even though a licensee may have filed for bankruptcy, the licensee remains totally responsible for all regulatory requirements. KDPH needs to know when a licensee is in bankruptcy proceedings in order to ensure the material and facilities are under control, in accountability, and do not cause any public health and safety concerns. KDPH shares its findings with other entities (i.e., trustees, etc) so that health and safety issues can be resolved prior to completion of bankruptcy proceedings.

KDPH must be notified immediately once a petition is filed for bankruptcy.

Response from Applicant: None at time of application.

Item 2: Location of Radioactive Material

Rule: 902 KAR 100:040, 902 KAR 100:142

Criteria: Applicants must provide a specific address for each location where radioactive material will be used, stored, or dispatched.

Discussion: Specify the street address, city, and state or other descriptive address, for each facility at which licensed material will be used, stored, or dispatched, and any field stations. Field stations are locations where licensed materials are stored or used and equipment is dispatched to temporary job sites. If devices will not be stored at a dispatch or field station, indicate this. The applicant should indicate whether or not these facilities will be used for use and/or storage of devices. A Post Office Box is not acceptable.

Note: Obtaining a KDPH license does not relieve a licensee from complying with other applicable federal, state or local regulations (e.g., local zoning requirements for storage locations).

Response from Applicant:

<p>2. Street address where radioactive material will be used (no P.O. Boxes)</p>

Item 3: Telephone Number

Criteria: List the telephone number at which the applicant can be contacted. This telephone number will be listed on the license document.

Discussion: Notify the agency if the telephone number changes. This notice is ‘for information only’ and does not require a license amendment fee.

Response from Applicant:

3. Telephone Number

Item 4. Person to Contact Regarding Application

Criteria: Identify the name and title of the individual who can answer questions about the application and include his or her telephone number.

Discussion: This is typically the proposed Radiation Safety Officer or a knowledgeable management official, unless the applicant has named a different person as the contact. The agency will contact this individual if there are questions about the application.

Notify the agency if the contact person or the contact person's telephone number changes so that the agency can contact the applicant or licensee in the future with questions, concerns, or information. This notice is 'for information only' and does not require a license amendment or a fee.

Response from Applicant:

4. Person to be contacted and listed as contact person

Obtaining a KDPH license does not relieve a licensee from complying with other applicable federal, state, or local regulations (e.g., local zoning requirements for storage locations).

Item 5 & 13: Training for Logging Supervisors and Logging Assistants, and Tracer/Field Flood Study Users

Regulations: 902 KAR 100:010, 902 KAR 100:040 and 902 KAR 100:142

Criteria: Well logging supervisors and well logging assistants must have adequate training and experience as outlined in **902 KAR 100:010, 902 KAR 100:040, and 902 KAR 100:142**. Although persons engaged in field flood studies operations are not specifically addressed in **902 KAR 100 'Kentucky Radiation Protection Regulations', 'Radiation Safety Requirements for Wire Line Service Operations'**, the agency will accept classroom training for tracer studies to be an appropriate guide for individuals engaged in field flood studies.

Discussion: A logging supervisor is a person who performs or personally supervises well logging operations, tracer/field flood study applications and is responsible for ensuring compliance with KDPH regulations and the safe use of radioactive materials. A logging assistant is an individual, who under the direct supervision and in the physical presence of the logging supervisor, uses well logging equipment (sealed sources containing byproduct material, related handling tools, unsealed sources of byproduct material, well logging devices, and radiation survey instruments) in performing well logging operations.

Didactic training and testing requirements, performance requirements, annual refresher training, and annual audit requirements for logging supervisors and logging assistants are outlined in **902 KAR 100:142**. Refer to **Appendix K** as an aid in determining the specific training requirements for logging supervisors, logging assistants, and individuals authorized to conduct field flood study/tracer applications. The applicant must submit a description of its training program for logging supervisors, logging assistants, and/or individuals

authorized to conduct field flood study applications. Because **902 KAR 100:142** contains different requirements for logging supervisors and logging assistants, applicants must include training programs for each category. When describing the training programs for these positions, include the sequence of events from the time of hiring through the designation of individuals as logging supervisors or logging assistants. Experienced logging supervisors who have worked for another well logging, tracer, or field flood study licensee should receive formal instruction similar to that given to prospective logging assistants.

Instructors who provide classroom training to individuals in the principles of radiation and radiation safety should have knowledge and understanding of these principles beyond those obtainable in a course similar to the one given to prospective logging supervisors. Individuals who provide instruction in the hands-on use of well logging and handling equipment should be qualified logging supervisors with at least 1 year of experience in performing well logging operations, or should possess a thorough understanding of the operation of well logging and handling equipment (e.g., a manufacturer's service representative).

An internal inspection program (audit) of the job performance of each logging supervisor and logging assistant ensures that the KDPH regulations, license requirements, and the licensee's operating and emergency procedures are followed. The audit must include observation of the performance of each logging supervisor and logging assistant during an actual well logging operation at intervals not to exceed 12 months. If a logging supervisor or logging assistant has not participated in a well logging operation for more than 12 months since the last inspection, the individual must be inspected the first time he or she engages in well logging operations.

Response from Applicant:

5. Individual(s) and Title(s) who will use or directly supervise use of radioactive material
RADIOACTIVE MATERIALS SHALL ONLY BE USED BY INDIVIDUALS WHO HAVE MET AND MAINTAINED COMPLIANCE WITH THE TRAINING CRITERIA ESTABLISHED IN 902 KAR 100:142 AND HAVE BEEN APPROVED, IN WRITING, BY THE RADIATION SAFETY OFFICER. THE LICENSEE SHALL MAINTAIN RECORDS OF THE TRAINING RECEIVED BY THE LOGGING SUPERVISOR(S) AND LOGGING ASSISTANT(S) FOR INSPECTION BY THE CABINET FOR FIVE (5) YEARS FOLLOWING THE LAST USE OF RADIOACTIVE MATERIAL BY THE INDIVIDUAL.

Item 6: Radiation Safety Officer (RSO)

Rule: 902 KAR 100:040, 902 KAR 100:142

Criteria: RSOs and potential designees are responsible for ensuring that the licensee's radiation safety program is implemented in accordance with approved procedures, and must have adequate training and experience.

Discussion: The person responsible for the radiation protection program is called the RSO. The agency believes the RSO is the key to overseeing and ensuring safe operation of the licensee's well logging, tracer, or field flood study program. The RSO needs independent authority to stop operations that he or she considers unsafe and have sufficient time and commitment from management to fulfill certain duties and responsibilities that ensure that radioactive materials are used in a safe manner.

The RSO may delegate certain day-to-day tasks of the radiation protection program to other responsible individuals (potential designees). For example, a large well logging firm with multiple field stations and/or temporary job sites may appoint individuals designated as 'site RSOs' who assist the RSO and are responsible for the day-to-day activities at the field stations and/or temporary job sites. Licensees may also appoint other individuals who may 'step-in' as an emergency contact when the RSO is unavailable. The potential designees do not need to meet the required RSO qualifications; however, these individuals should be qualified and

experienced with adequate knowledge of the activities to which they are assigned. Applicants do not have to identify other responsible individuals if day-to-day tasks, etc. will not be delegated.

Table 2. Radiation Safety Officer Duties and Authorities

Radiation Safety Officer Duties and Authorities
1. Establish and oversee all operating, emergency, and ALARA procedures and review them regularly.
2. Oversee proper disposal of all material including transportation of the material according to KDPH and DOT requirements.
3. Ensure required inventories, leak tests, etc are conducted and the records are recorded and maintained.
4. Ensure personnel are trained as required.
5. Operations are conducted safely and corrective actions are implemented, when necessary, including terminating operations.
6. Make certain all use and maintenance is performed and operations and equipment are used properly.
7. Perform annual audit and notify appropriate parties if any item is found to be not in compliance with KDPH rule.
8. Maintain records and calibration of all survey instruments and determine each for proper operation.
9. Preserve accountability of all sources and devices while in field and in the office.
10. Be prepared to monitor any emergency event including loss of a source downhole or possible rupture.
Above all, the RSO is the key to maintaining the radiation safety of the operations to the workers, the public, and the environment.

Typical RSO duties are listed in **Table 2** and **Appendix G**. The agency requires the name of the RSO on the license to ensure that licensee management has always identified a responsible, qualified person and that the named individual knows of his or her designation as RSO. Provide the agency with a copy of an organizational chart showing the RSO and other designated responsible individuals, to demonstrate that he or she has sufficient independence and direct communication with responsible management officials. Also, show in the organizational chart the position of the individual who signs the application in **Item 15** of the KDPH form, ‘Application for a Radioactive Material License Authorizing the Use of Material in Wire Line Service Operations’ (**Appendix A**).

To be considered eligible for the RSO position, the applicant must submit for review the specific training and experience of the proposed RSO and detail his or her duties and responsibilities[**902 KAR 100:040(4)(a)**]. The proposed RSO should have had a **minimum of 1 year of actual experience as a logging supervisor (NUREG 1556, v14)**. The RSO is expected to coordinate the safe use of licensed materials and to ensure compliance with the applicable requirements of **902 KAR 100, ‘Kentucky Radiation Protection Regulations’**. The RSO should possess a thorough knowledge of management policies, company administrative and operating procedures, and safety procedures related to protection against radiation exposures.

Response from Applicant:

6. Radiation Safety Officer (one person)	Training and experience required for each user named in Item 5 and for the Radiation Safety Officer in Item 6. For the RSO, duties and responsibilities of the RSO and updated organizational chart are required and if necessary, a signature authorization form.
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The applicant shall also provide the following:

- Document that may be incorporated into the radiation safety program which outlines the duties and responsibilities of the RSO (**Appendix G**)
- A delegation of Authority letter that is compatible with the sample letter provided in **Appendix C**.
- A Signature Authorization letter that is compatible with the sample letter provided in **Appendix D**.

Note: A Signature Authorization letter is not required for the RSO, however, if senior management does not grant the RSO signature authorization then a member of senior management must sign all correspondence with the agency. It is important to notify the agency and obtain a license amendment prior to making changes in the designation of the RSO responsible for the radiation safety program.

Item 7: Radioactive Material

Rule: 902 KAR 100:019, 902 KAR 100:040, 902 KAR 100:142

Criteria: An application for a license will be approved if the requirements of **902 KAR 100** are met. In addition, licensees will be authorized to possess and use only those sealed sources and devices that are specifically approved or registered by the NRC or another Agreement State.

Any sealed source used for well logging that contains more than 3.7 MBq (100 microcuries) of byproduct or special nuclear material and is used downhole in well bores of gas wells, oil wells, or in mineral deposits, must satisfy one of the following criteria:

- Sealed sources that were manufactured before July 14, 1989, may use either the design and performance criteria from the United States of America Standards Institute (USASI) N5 10-1968 or the criteria specified in **902 KAR 100:142 or 10 CFR 39.41**. The use of the USASI N5 10-1968 standard is based on an NRC Notice of Generic Exemption, a copy of the referenced generic exemption letter is included in **Appendix J**.
- Sealed sources are required to satisfy the requirements of **902 KAR 100:142**.

The primary difference between the two standards is that the vibration requirement in 902 KAR 100:142 is not included in the USASI standard. This vibration test was included to ensure consistency between the United States standard and international standards.
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Discussion: Applicants should list each requested radioisotope by its element name and mass number (e.g., Cesium-137), specify whether the material will be acquired and used in unsealed or sealed form, and list the maximum amount requested.

Note: Additional safety equipment and precautions are required when handling and using unsealed free-form volatile radioactive materials. (Volatile means that a liquid becomes a gas at a relatively low temperature when the sealed container within which the liquid is stored is left open to the environment.) Applicants requesting an authorization to

use volatile radioactive material must provide appropriate facilities, handling equipment, and radiation safety procedures for using such material.

Possession limits should be specified in megabecquerels (MBq) (millicuries (mCi)) or gigabecquerels (GBq) (curies (Ci)) for each radioisotope. Applicants should include in the possession limits requested the total estimated inventory, including licensed material in storage and maintained as radioactive waste. The requested possession limits for any radioisotope should be commensurate with the applicant's needs and facilities for safe handling. Applicants, when establishing their possession limits for radioactive materials with half-lives greater than 120 days, should review the requirements for submitting a certification for financial assurance for decommissioning, see **Appendix I**.

If a dose evaluation indicates, due to a release of radioactive materials, that the potential dose to a person off-site would exceed 0.01 sieverts (Sv) (1 rem) effective dose equivalent or 0.05 Sv (5 rems) to the thyroid, an emergency plan for responding to a release shall be included with the application. For Iodine-131, the quantity requiring an emergency plan is 370 GBq (10 curies).

Consult with the proposed supplier, manufacturer, or distributor to ensure that requested sources and devices, where applicable, are compatible with and conform to the sealed source and device designations as registered. Licensees may not make any changes to the sealed source, device, or source/device combination that would alter the description or specifications from those indicated in the respective registration certificates, without obtaining KDPH's prior permission in a license amendment. To ensure that applicants use sources and devices according to the registration certificates, they may want to get a copy of the certificate and review it or discuss it with the manufacturer.

Sealed Sources

NRC or another Agreement State performs a safety evaluation of sealed sources before authorizing a manufacturer or distributor to distribute sources to specific licensees. The safety evaluation is documented in a Sealed Source and Device (SSD) Registration Certificate. Some examples of sealed sources used in well logging applications are shown in **Figure 1**.

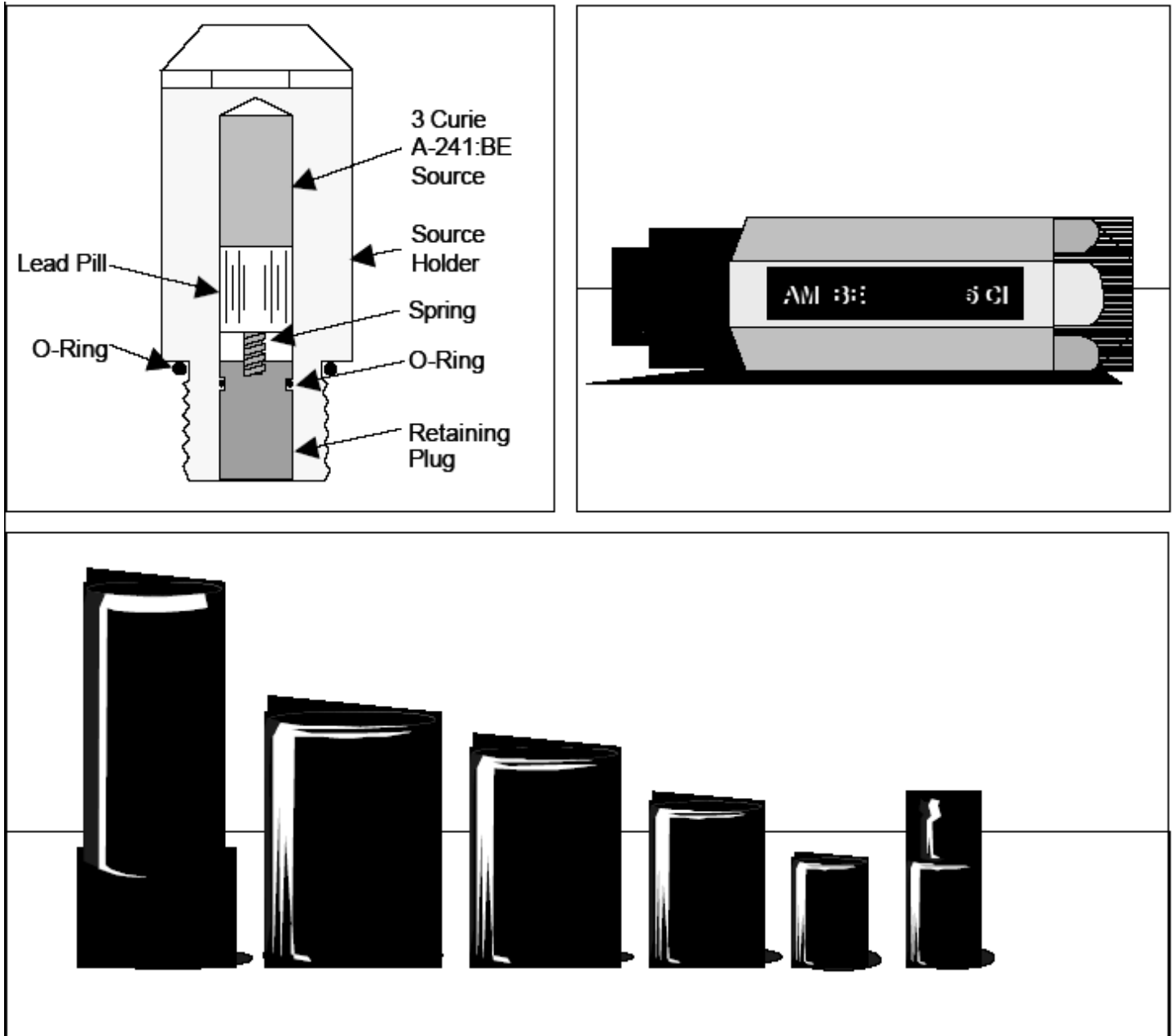


Figure 1. Examples of Sealed Sources Used in Well Logging Operations.

Applicants must provide the manufacturer’s name and model number for each requested sealed source. This information is necessary to ensure that each sealed source requested in the application is included in an SSD Registration Certificate, approved under the provisions granted by **902 KAR 100:142**, or is identified on an KDPH license and authorized for well logging. Applicants should consult with the proposed suppliers or vendors to ensure that the sealed sources and their uses for them, and if applicable, devices and other associated equipment, are in accordance with Registration Certificates. Applicants are encouraged to obtain copies of applicable SSD Registration Certificates for future reference. Sealed Source and Device Registry Certificates may also be obtained by calling the agency at (502) 564-3700.

For sealed sources used for well logging applications, only authorized possession of individual sealed sources are approved for well logging. To allow flexibility, it is necessary to get authorization for specific sealed source/well logging tool combinations. Consult with the manufacturer of the sealed sources before using associated equipment (e.g., well logging tools, transport containers, handling tools, etc) to ensure that the associated equipment selected is compatible with sealed sources requested in the application.

A safety evaluation of sealed sources and devices is performed by NRC or another Agreement State before authorizing a manufacturer (or distributor) to distribute them to specific licensees. The safety evaluation is documented in a SSD Registration Certificate. SSD Registration Certificates contain sections on "*Conditions of Normal Use*" and "*Limitation and Other Considerations of Use*". These sections may include limitations derived from conditions imposed by the manufacturer or distributor, by particular conditions of use that would reduce radiation safety of the device, or by circumstances unique to the sealed source or device. Except as specifically approved by KDPH, licensees are required to use the sealed source and devices according to their respective SSD Registration Certificates. Information on SSD Registration Certificates may be obtained through the agency, if necessary. Applicants must provide the manufacturer's name and model number for each requested sealed source and device (e.g., instrument calibrator) so that the agency can verify that each, when applicable, has been evaluated in an SSD Registration Certificate.

Tracer Materials

Each authorized radioisotope tracer will be listed on the license by its element name, chemical and/or physical form, and total possession limit. **Table 3** identifies the types of byproduct material used in tracer and field flood study applications covered by this report.

The following definitions are provided to clarify single and multiple well tracer operations addressed in this report:

- **Tracer Materials:** Radioactive isotopes in liquid, solid, or gas form that are injected into single well bores or underground reservoirs to monitor the movement of fluids or gases. Tracer studies involve a single well and require the use of an electronic well logging tool to detect the radioactive isotopes injected into the well.
- **Field Flood Studies or Enhanced Oil and Gas Recovery Studies:** Tracer studies involving multiple wells where one or more radioactive isotopes are injected and multiple oil or gas samples containing radioactive material are collected from each of the wells to determine the direction and rate of flow through the formation. Field flood tracer operations would not normally involve the use of an electronic well logging tool to detect the radioactive isotopes in the well.
- **Labeled Frac Sands:** Radioactive isotope(s) in liquid or solid forms that is (are) chemically bonded to glass and/or resin beads and injected into a single well in a density-controlled solution. Frac sand operations require the use of an electronic well logging tool to assess the amount of radioactive isotope(s) remaining in the underground reservoir formation.

Table 3. Types of Radioactive Materials Used in Field Flood Studies and Single Well Tracer Operations

Field Flood or Enhanced Oil and Gas Recovery Study Applications Tracers Used in Multiple Wells	
Gas	H-3, Kr-85, C-14, Br-82
Liquid	H-3, Na-22, S-35, Ca-45, Co-60, Ni-63, Zn-65, Sr-85, Sc-46, Sr-90, Ag-110m, I-125, I-131, La-140, Ir-192
Well Logging Tracer Applications Tracers Used in a Single Well	
Gas	Br-82, I-131, I-125
Liquid	Fe-59, I-125, I-131, Sb-124, Au-198, Ag-110m

Labeled Frac Sand	Sc-46, Br-82, Ag-110m, Sb-124, Ir-192
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Applicant must provide emergency plan, if required. Emergency plans are not routinely required for tracer materials with half-lives of less than 120 days and for quantities authorized in well logging and tracer licenses. Applicants should refer to **902 KAR 100:041** to determine the quantities of radioactive material requiring an emergency plan for responding to a release.

Response from Applicant:

7. Licensed Material				
Element & Mass Number A	Chemical and/or Physical Form B	Manufacturer Name & Model Number (if sealed source) C	Maximum activity (millicuries) per sealed source <u>OR</u> maximum activity possessed at any one time D	Maximum number of sealed source/device combinations possessed at any one time E
Describe use of radioactive material (Should be keyed to material in sub-item A above. For specific make & model of sealed source/device combinations in sub-item E above, state maximum number possessed at any one time)				

Item 7.1: Purpose(s) for Which Licensed Material will be Used

Rule: 902 KAR 100:019, 902 KAR 100:142

Criteria: Radioisotopes and sealed sources requested in the application must be used for purposes authorized by **902 KAR 100, ‘Kentucky Radiation Protection Regulations’**. The licensee must specify the purpose for which each radioisotope or sealed source listed in **Item 7** is to be used, as well as specifying the type of wells in which each type of material will be used (e.g., oil, gas, mineral, geophysical, etc.). In addition, the licensee should describe the type of mineral or geophysical logging to be conducted (e.g., coal, salt domes, etc). Sealed sources used in well logging devices should be used only for the purposes for which they were designed, in accordance with the manufacturer’s written recommendations and instructions, as specified in an approved SSD Registration Certificate, and as authorized on a KDPH license. The licensee shall specify the manufacturer and model number of each device.

Discussion: The applicant’s request to use sealed sources and radioisotopes in well logging, tracer, and field flood studies should clearly specify the purpose for which each type of material will be used. Applicants should include a description that is sufficiently detailed to allow a determination for the potential for exposure to occupationally exposed individuals and/or members of the public.

Note: Traditionally, only federal or state authorities have been authorized to conduct logging in potable water wells in fresh water aquifers. Approval to conduct these operations requires that applicants justify the need and to provide assurance that sealed sources, in case of accidental loss in a potable water zone, could be recovered.

Applicants requesting authorization to perform any of the hazardous operations listed below should clearly indicate their intent and provide specific instructions for conducting such activities in their operating and emergency procedures:

- Removing a sealed source from a source holder of a logging tool and maintenance on sealed sources or holders
- Using destructive techniques to remove a stuck sealed source from a source holder
- Opening, repairing, or modifying any sealed source
- Knowingly injecting licensed radioactive tracer material into a fresh water aquifer
- Using a sealed source in a well without a surface casing to protect fresh water aquifers.

Applicants may use the format given in **Table 4** to provide the requested information.

Table 4. Sample Format for Providing Information About Requested Radioisotopes

Radioisotope	Chemical/Physical Form	Maximum Possession Limit	Proposed Use
Americium-241	Sealed neutron source (XYZ Inc., Model 10)	Not to exceed 5 curies per source	Oil, gas, and/or mineral logging.
Cesium-137	Sealed source (Okko Inc., Model 36)	Not to exceed 3 curies per source	Oil, gas, and/or mineral logging.
Hydrogen-3	Gas, titanium tritide neutron generator tube (Cols Inc., Model 3)	Not to exceed 3 curies per tube	Neutron activation logging in oil and gas wells in downhole accelerator
Iodine-131	Gas	100 millicuries total, not to exceed 20 millicuries per injection	Subsurface Tracer Operations
Iodine-131	Liquid	50 millicuries total, not to exceed 10 millicuries per injection	Subsurface Tracer Operations
Iridium-192	‘Labeled’ frac sand	200 millicuries total, not to exceed 15 millicuries per injection	Subsurface Tracer Operations
Cobalt-60	Metal wire	3 millicuries total, not to exceed 1 microcurie per individual unit	Pipe Joint Collar Markers, Subsidence Markers, Depth Determination
Silver-110m	Liquid	200 millicuries total, not to exceed 20 millicuries per injection	Field Flood Tracer Studies
Depleted Uranium	Sinker Bars	225 kilograms	Sinker Weights (Concentrated Mass)

If the material will be used in field flood studies where licensed material is intentionally released into the environment, an environmental assessment (EA) is required in accordance with appropriate United States Code regulations (**10 CFR 51.21**). NRC Supplement to Policy and Guidance Directive FC 84-20, *“Impact of Revision of 10 CFR Part 51 on Materials License Actions”*, Revision 1, provides criteria for determining when an EA is not needed. Applicants should note that authorization granted by KDPH to use licensed material in tracer or field flood studies does not relieve them of their responsibilities to comply with any other applicable federal, state or local regulatory requirements.

Response from Applicant: No response required as long as the information was included in **Item 7**.

Items 8 and 9: Radiation Detection Instrumentation and Calibration:

Rule: 902 KAR 100:019, 902 KAR 100:040 902 KAR 100:142

Criteria: Licensees must possess radiation monitoring instruments that are necessary to protect health and minimize danger to life or property. Instruments used for quantitative radiation measurements must be calibrated for the radiation that it is used to measure at least every 6 months. For the purposes of this document, survey instruments are defined as any device used to measure the radiological conditions at a licensed facility, field station, or temporary job site.

Discussion: For well logging and tracer operations, instruments must be capable of measuring 0.001 millisievert (0.1 mrem) per hour through at least 0.5 millisievert (50 mrem) per hour. Licensees shall possess operable and calibrated radiation detection/measurement instruments to perform the following: surveys of package(s), vehicle(s), tracer material equipment, vehicles, personnel, and sites, unrestricted areas, and sealed sources.

The choice of instrument should be appropriate for the type of radiation to be measured, and for the type of measurement to be taken (count rate, dose rate, etc.). Applications should include descriptions of the instrumentation available for use and instrumentation that applicants intend to purchase prior to starting licensed activities. The description should include type of instrument and probe, and the instrument’s intended purpose.

The agency requires that calibrations be performed by the instrument manufacturer or a person specifically authorized by KDPH, the NRC or another Agreement State, unless the applicant specifically requests this authorization. Applicants seeking authorization to perform survey instrument calibrations shall submit procedures for review (**Appendix M**).

Response from Applicant:

8. Radiation Detection Instruments			
<u>Model</u>	<u>Number Available</u>	<u>Radiation Detected (alpha, beta, gamma, neutron)</u>	<u>Sensitivity Range</u>

9. a) Calibrated by Service Company (Name, Address, and Frequency)	b) Calibrated by Applicant (Attach procedures describing method and standards used)
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Note: For detailed information about survey instrument calibration, refer to ANSI N323-1978, 'Radiation Protection Instrumentation Test and Calibration'. Reaffirmed 1993 copies may be obtained from the American National Standards Institute, 1430 Broadway, New York, NY 10018.

10. Personnel Monitoring Devices (Occupational Dosimetry)

Rule: 902 KAR 100:019, 902 KAR 100:010

Criteria: According to **902 KAR 100:019**, logging supervisors and logging assistants must wear either film badges or thermoluminescent dosimeters (TLDs) during the handling or use of licensed radioactive material. This requirement applies to personnel using dosimeters for whole body measurements. Although not included in **902 KAR 100:019**, KDPH and some other Agreement States have authorized Optically Stimulated Luminescence (OSL) dosimetry devices approved by the National Voluntary Laboratory Accreditation Program (NVLAP). NRC is currently in the process of amending its regulations to authorize the use of OSL dosimetry devices. Licensees must provide to employees, either a film, OSL, or TLD that is processed by an accredited entity under the NVLAP operated by the National Institute of Standards and Technology (NIST).

Appendix N provides guidance for determining if individuals other than the RSO, logging supervisors, or logging assistants require dosimetry.

Bioassay services required in a license must be provided to individuals using tracer materials in subsurface studies if required by the license.

Table 5. Occupational Dose Limits for Adults.

Occupational Dose Limits for Adults (902 KAR 100:019)	
<u>Body Location</u>	<u>Dose (Annual)</u>
Total Effective Dose Equivalent (TEDE)	0.05 Sv (5 Rem)
Dose to the skin of the whole body or any extremity*	0.5 Sv (50 Rem)
Dose to lens of the eyes	0.15 Sv (15 Rem)
<i>*Extremities includes the arms below the elbows and the legs below the knees</i>	

Discussion: The licensee may not permit any individual to act as a logging supervisor or logging assistant unless, at all times during the handling of licensed radioactive material, each individual wears on the trunk of the body a NVLAP-approved film badge, TLD, or OSL/personnel dosimeter (if specifically approved by

KDPH) that is sensitive to the type of radiation(s) to which the individual is exposed. If neutron sources are to be used, a commitment to provide neutron sensitive dosimetry devices is required. Film badges must be replaced at intervals not to exceed 1 month and TLDs or OSL must be replaced at intervals not to exceed 3 months.

10. Personal Monitoring Devices		
Type	Supplier	Exchange Frequency
<input type="checkbox"/> (1) Film Badge <input type="checkbox"/> (2) TLD <input type="checkbox"/> (3) OSLD <input type="checkbox"/> (4) Other (specify)		<input type="checkbox"/> Monthly <input type="checkbox"/> Bi-monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Other (specify)

For purposes of internal dosimetry, bioassays are required when individuals work with volatile radioactive material in the quantities, chemical and physical forms, and activities that make it likely that the radionuclide will be ingested, inhaled, or absorbed resulting in an intake in excess of 10% of the applicable annual limit on intakes (ALIs) in **902 KAR 100:019**. One ALI results in a committed effective dose equivalent (CEDE) of 5 rems or a committed dose equivalent (CDE) of 50 rems.

When using individually packaged ‘ready to use’ quantities of Iodine-131 tracer materials in well logging operations, bioassays are required for individuals using more than 50 millicuries at any one time, or using a total of 50 millicuries within any 5-day period. Guidance on bioassay programs for Iodine-131, including the levels and types of handling for which bioassays are indicated, is provided in the NRC Regulatory Guide 8.20, “*Applications of Bioassay for iodine-125 and iodine-131*”. Copies may be obtained from NRC’s Regional Offices or online at <http://www.nrc.gov>. Bioassay services are available and provided by local hospitals, universities, or other vendors specifically approved to provide such services.

Bioassay programs should include what the applicant considers an acceptable interval or schedule for conducting bioassays, identify action levels or guidelines, and describe specific actions to be taken when action levels are exceeded. Because of the complex nature of bioassay and corresponding data analysis, it is acceptable for applicants to make reference to the procedures in KDPH or NRC guidance documents.

Response from Applicant:

We will provide required dosimetry that will be processed and evaluated by a NVLAP-approved processor that is exchanged monthly or quarterly, as appropriate, and worn by well logging personnel.

AND/OR

We will provide a bioassay program when using unsealed tracer materials.

OR

We will provide a commitment that no individual will use more than 50 millicuries of Iodine-131 at any one time or in any 5-day period at field stations or temporary job sites.

Note: If intend to use an excess of amounts described or request permission to repackage or process Iodine-131 tracer materials at field stations, it is necessary to describe in detail the bioassay program

OR

We will contract an vendor for bioassay services who is licensed or otherwise authorized by KDPH, NRC, or another Agreement State to provide required bioassay services.

To obtain a copy of the NIST Publication 810, “*National Voluntary Laboratory Accreditation Program, 1997 Directory*”, contact the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402-9225. (For information on the program, call NIST at 301-975- 3679.) Also, NVLAP maintains a directory of accredited laboratories on the Internet (updated quarterly); the URL for NVLAP’s home page on the Internet is <http://ts.nist.gov/nvlap>.

Item 11: Facilities and Equipment

Rule: 902 KAR 100:019, 902 KAR 100:040, 902 KAR 100:142

Criteria: Facilities and equipment must be adequate to protect health, minimize danger to life or property and the possibility of contamination, and keep exposure to occupationally exposed workers and the public ALARA.

Discussion: Applicants must demonstrate that proposed facilities and equipment provide adequate storage capabilities, ensure that appropriate shielding is available to protect the health and safety of the public and employees, keep exposures to radiation and radioactive materials ALARA, and minimize the possibility of contamination from the uses, types, and quantities of radioactive materials requested.

Licensed materials located in an unrestricted area and not in storage must be under the constant surveillance and immediate control of the licensee. Areas where material is used or stored, including below ground bunker storage areas, should (1) be accessible only by authorized persons; and (2) secured or locked when an authorized person is not physically present. Use or storage areas cannot be considered restricted areas for purposes of radiation safety if accessible by unauthorized persons.

Applicants may delay completing facilities and acquiring equipment until after the application review is completed. Delaying the acquisition will allow for changes, if any, needed as a result of the application review. This delay will also ensure the adequacy of proposed facilities and equipment before the applicant makes a significant financial commitment. In all cases, the applicant cannot possess or use licensed material until after the facilities are approved, equipment is procured, and the license is issued.

Provide the following, as applicable:

- A drawing or sketch to an indicated scale or including dimensions of each proposed facility identifying areas where radioactive materials, including radioactive wastes, will be used or stored as well as adjacent buildings, boundary lines, security fences, and lockable storage areas. Illustrate area(s) where explosive, flammable, or other hazardous materials will be stored and the relationship and distance between restricted areas and unrestricted areas. Specify shielding materials (concrete, lead, etc) and means for securing radioactive materials from unauthorized removal.
- A drawing or sketch of proposed tracer material storage facilities including rooms, buildings, below ground bunker storage areas, or containers used for storage of both tracer and tracer waste materials;

specifying the types and amount of shielding materials (concrete, lead, etc.) and means for securing tracer materials from unauthorized removal.

- Describe protective clothing (such as rubber gloves, coveralls, respirators, and face shields), auxiliary shielding, absorbent materials, injection equipment, secondary containers for waste water storage for decontamination purposes, plastic bags for storing contaminated items, etc., that will be available at well sites when using tracer materials.
- Describe proposed laundry facilities used for contaminated protective clothing, and specify how the contaminated waste water from the laundry machines or sinks is disposed. Operating and emergency procedures should address decontamination of the laundry area and equipment.
- Describe proposed decontamination facilities for trucks, tracer injection tools, or other equipment contaminated by tracer materials and specify how the contaminated waste water will be disposed. Operating and emergency procedures should address decontamination of these types of equipment and facilities.
- Describe equipment for ‘repackaging’ gaseous, volatile, or finely divided tracer material. Most tracer users do not repackage materials and acquire their injections in pre-calibrated amounts or ‘ready to use’ forms. However, should an applicant request the ability to repackage tracer, volatile, or finely divided materials, consider the following equipment when repackaging tracer materials: sinks, trays with absorbent material, glove boxes, fume hoods with charcoal filtration, filtered exhaust, special handling equipment including special tools, rubber gloves, etc.

902 KAR 100:021 authorizes the disposal of readily soluble radioactive materials via the sanitary sewage. Sanitary sewage does not include sewage treatment facilities, septic tanks, and leach fields owned or operated by a licensee.

Response from Applicant:

We will submit the required information as listed in the section titled “Facilities and Equipment” of KYREGS ‘Guidance for Well Logging,, Tracer, and Field Flood Study’

Item 11.1 Minimization of Contamination

Rule: 902 KAR 100:142

Criteria: Applicants for new licenses must describe how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize, to the extent practicable, the generation of radioactive waste.

Discussion: When designing facilities and developing procedures for their safe use, applicants should plan ahead and consider how to minimize radioactive contamination during operation, decontamination and decommissioning efforts, and radioactive waste generation. When submitting new applications, applicants should consider the following:

- Implementation of and adherence to good health physics practices while performing operations
- Minimization of distance to areas, to the extent practicable, where licensed materials are used and stored
- Maximization of survey frequency, within reason, to enhance detection of contamination
- Segregation of radioactive material in waste storage areas
- Segregation of sealed sources and tracer materials to prevent cross-contamination
- Separation of radioactive material from explosives
- Separation of potentially contaminated areas from clean areas by barriers or other controls.

Sealed sources found to be leaking in excess of 185 bequerels (0.005 microcuries) of removal contamination must be immediately withdrawn from use and placed in a safe storage location until disposed of according to KDPH requirements. Special authorization must be granted by KDPH to applicants to decontaminate a facility contaminated by a leaking sealed source. Approval granted in a license by KDPH, NRC, or another Agreement State to provide these specialized services minimizes the spread of contamination and reduces radioactive waste associated with decontamination efforts.

Response from Applicant: None for this item; it has been included in other responses.

8. Radiation Detection Instruments			
<u>Model</u>	<u>Number Available</u>	<u>Radiation Detected (alpha, beta, gamma, neutron)</u>	<u>Sensitivity Range</u>
9. a) Calibrated by Service Company (Name, Address, and Frequency)		b) Calibrated by Applicant (Attach procedures describing method and standards used)	

Item 12: Radiation Protection Program

Rule: 902 KAR 100:019

Criteria: A radiation safety program must be established and submitted to the agency as part of the application. The program must be commensurate with the scope and extent of activities for the use of licensed materials in well logging, tracer, and field flood study operations. Each applicant must develop, document, and implement a radiation protection program containing the following elements:

- Development and implementation of an ALARA program
- Description of equipment and facilities adequate to protect personnel, public, and the environment
- Confirmation that licensed activities are conducted only by individuals qualified by training and experience
- Development and maintenance of written operating and emergency procedures
- Implementation of an audit program to inspect the job performance of well logging supervisors and assistants
- Description of organization structure and individuals responsible for ensuring day-to-day oversight of the radiation safety program
- Establishment and management of a radiation safety and decommissioning records system.

Discussion: Individual components of a radiation safety program are addressed in the topics found in this KYREGS. Some topics will not require the applicant to submit information as part of an application, but

simply provide the applicant with guidance to comply with a specific KDPH requirement. Applicants who plan to conduct well logging operations using sealed sources, tracer materials or tracer materials in field flood study operations are required to submit, for KDPH approval, their operating and emergency procedures or, optionally, to provide either an outline or summary of each procedure that includes the important radiation safety aspects of each individual procedure.

Radiation safety programs including tracer materials must assure that they address these additional concerns: methods or procedures for preventing the release of contaminated material, equipment or vehicles to unrestricted use from tracer or field flood study operations, radiation safety procedures and the well logging supervisors' responsibilities unique to tracer and field flood study operations, and tracer and field flood study equipment, techniques, and corresponding radiation safety procedures associated with use of tracer materials.

Appendix F includes a description of procedures for using tracer materials in field flood study operations.

Response from Applicant:

We have included our radiation safety program for agency review

Item 12.1 Well Owner/Operator Agreement

Rule: 902 KAR 100:142

Criteria: Well logging conducted with a sealed source shall only be performed if a written agreement with the employing well owner or operator is executed prior to commencement of the operation.

Discussion: Well logging operations conducted using a sealed source are performed only after a written agreement is executed with the employing well owner or operator. Written agreements must identify a responsible party for ensuring that the following steps will be taken if a source becomes lodged in a hole:

- A reasonable effort will be made to recover the source
- A person will not attempt to recover a lodged sealed source in a manner that, in the licensee's opinion, could result in its rupture
- During efforts to recover a sealed source, a licensee must continuously monitor the circulating fluids in the well bore, as required in **902 KAR 100:142 Section 24(4)**
- Contaminated equipment, personnel, or environment must be decontaminated prior to release
- If a sealed source is classified by the licensee as irretrievable after reasonable efforts at recovery have been expended, the following must be implemented within 30 days, as shown in **Figure 2**:
 - Source must be immobilized and sealed in place with a cement plug and there must be a means to prevent inadvertent intrusion, unless the source is not accessible to any subsequent drilling operations
 - Install a permanent identification plaque at the surface of the well, unless mounting of a plaque is not practical. **Figure 3** provides a diagram of a permanent identification plaque, describing the information that should be included on the plaque.
 - Notify the agency by telephone of the circumstances that resulted in the inability to retrieve the source and obtain approval to implement abandonment procedures.
- Send a copy of the abandonment report within 30 days of the abandonment of the sealed source, to the agency and Kentucky Department of Mines, Minerals, and Energy; Division of Gas and Oil. The abandonment report must contain all the information outlined in **902 KAR 100:142**. Refer to **Appendix T** for additional guidance.

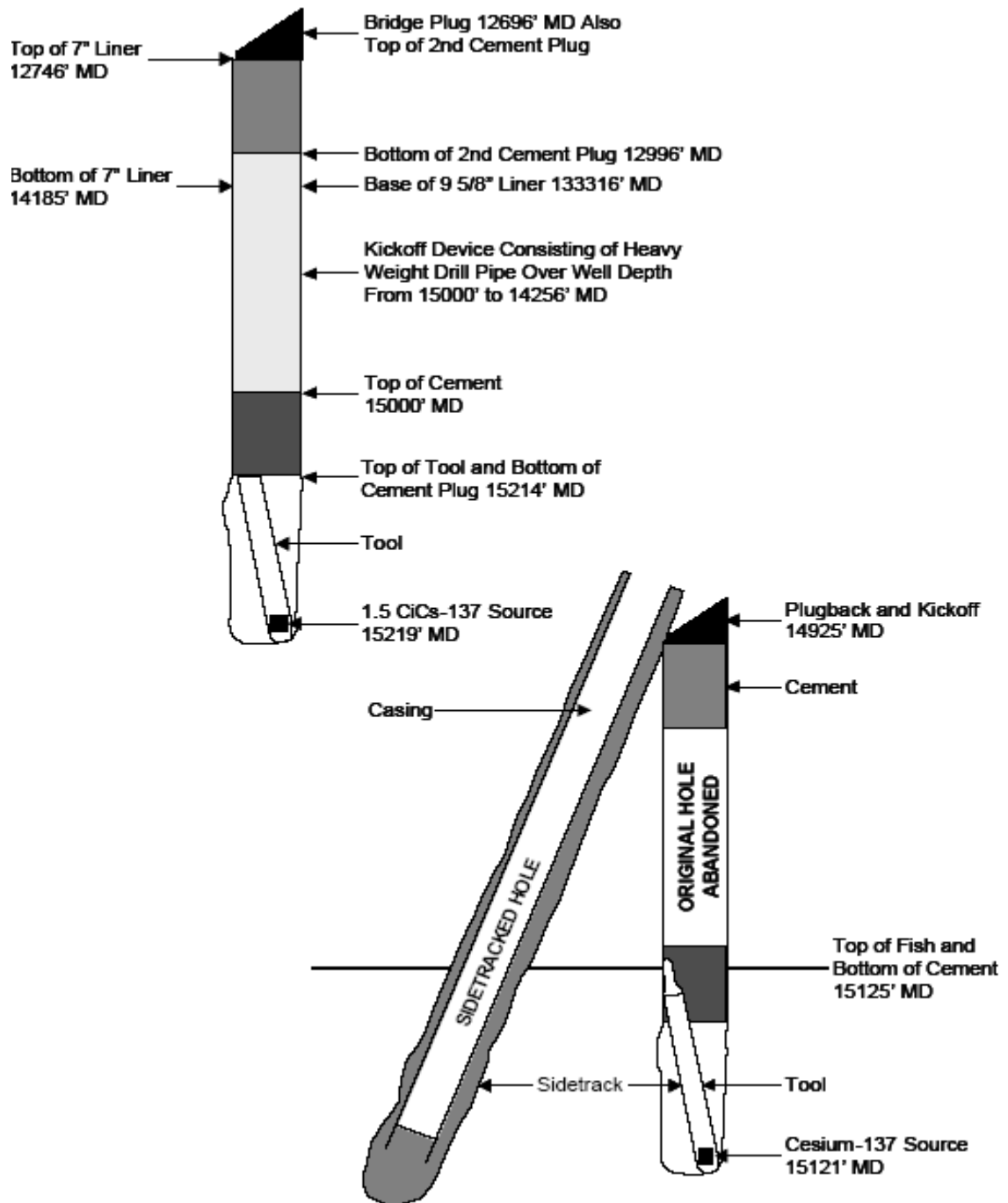


Figure 2. Features of a Typical Source Abandonment.

The agency is aware that in some circumstances, such as high well pressures that could lead to fires or explosions, the delay required to obtain approval to abandon the well may introduce an immediate threat. **Under such exigent circumstances, immediate abandonment, without prior approval, is authorized if a delay could cause an immediate threat to public health and safety.** Notification would be made as soon as possible after the abandonment. See **902 KAR 100:019 and 902 KAR 100:142.**

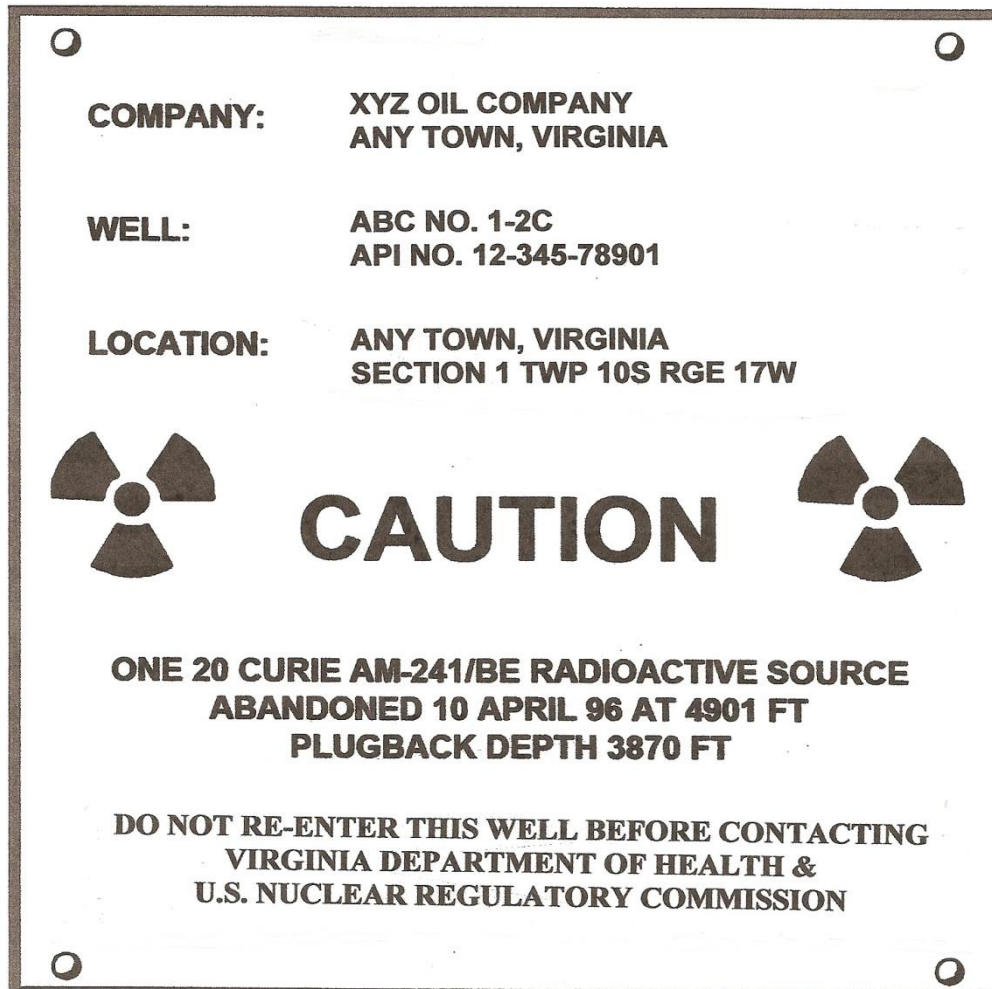


Figure 3. Permanent Identification Plaque.

Note: A written agreement is not required if the licensee and well owner or operator are part of the same corporate structure or otherwise similarly affiliated. However, all other requirements must still be met. If the requirement for a written agreement does not apply to you, then you should include a statement in your application that you will only log holes where the well owner or operator is part of your corporate structure or otherwise similarly affiliated, and you should describe the corporate affiliation.

Response from Applicant:

We will obtain a written agreement prior to commencement of operating any well logging operation with a sealed source as specified in **902 KAR 100:142**

Item 12.2 Radiation Safety Program Audit

Rule: 902 KAR 100:019, 902 KAR 100:040

Criteria: Licensees must review the content and implementation of their radiation protection programs annually to ensure the following:

- 1) Compliance with KDPH and DOT regulations (as applicable), and the terms and conditions of the license,
- 2) Occupational doses and doses to members of the public are ALARA (**902 KAR 100:019 (2)**),
- 3) Records of audits and other reviews of program content and implementation are maintained for 3 years.

Discussion: Licensees are encouraged to implement as part of the radiation safety program a self-assessment and corrective action tracking program. Assessments necessary to ensure safe operations should result in a continuous process to self-identify violations, implement immediate corrective action when required, and track to completion and close-out of self-identified violations. The agency's enforcement policy is designed to encourage and to give credit to licensees for self-identifying violations and for taking immediate corrective actions. This policy allows licensees with a good regulatory performance, as shown by a licensee's inspection history, to be inspected less frequently than licensees where the agency has identified significant violation(s) during an inspection. Although the annual ALARA audit required by **902 KAR 100:019** is an important cornerstone of the radiation safety program, the agency encourages applicants/licensees to develop and implement an ongoing audit program and corresponding corrective action tracking program.

Appendix H contains a suggested annual audit program that is specific to well logging and tracer operations and is acceptable to the agency. All areas indicated may not be applicable to every licensee and may not need to be addressed during each audit.

Response from Applicant:

The applicant is not required to, and should not, submit its audit program to the agency for review during the licensing phase. This matter will be examined during an inspection.

Item 12.3 Termination of Activities

Rule: 902 KAR 100:040

Criteria: Pursuant to the regulations described above, the licensee must do the following:

- Notify the agency, in writing, a decision to permanently cease licensed activities at the entire site (regardless of contamination levels)
a decision to permanently cease licensed activities in any separate building or outdoor area, if they contain residual radioactivity making them unsuitable for release according to KDPH requirements — no principal activities having been conducted at the entire site under the license for a period of 24 months
— no principal activities having not been conducted for a period of 24 months in any separate building or outdoor area, if they contain residual radioactivity making them unsuitable for release according to KDPH requirements.
- Submit decommissioning plan, if required by **902 KAR 100:042**.
- Conduct decommissioning, as required by **902 KAR 100:040 and 902 KAR 100:042**.
- Submit, to the agency, a completed KDPH **RPS-10** form, 'Certificate of Disposition of Materials' (**Appendix B**) and a demonstration that the premises are suitable for release for unrestricted use (e.g., results of final survey).

- Before a license is terminated, send the records important to decommissioning to the agency. If licensed activities are transferred or assigned in accordance with **902 KAR 100:040**, transfer records important to decommissioning to the new licensee.

Discussion: As discussed above, before a licensee can decide whether it must notify the agency, the licensee must determine whether residual radioactivity is present and, if so, whether the levels make the building or outdoor area unsuitable for release according to KDPH requirements. A licensee's determination that a facility is not contaminated is subject to verification by KDPH inspection.

The permanent cessation of principal activities in an individual room or laboratory may require the licensee to notify the agency if no other licensed activities are being performed in the building. NRC Draft Regulatory Guide DG-4006, "*Demonstrating Radiological Criteria For License Termination*", issued July 8, 1998 and NUREG/BR-0241, "*NMSS Handbook for Decommissioning Fuel Cycle and Materials Licenses*", dated March 1997, contain the current regulatory guidance concerning decommissioning of facilities and termination of licenses.

Appendix B of the Handbook contains a comprehensive list of NRC's decommissioning regulations and guidance. NUREG-1575, "*Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)*", dated December 1997, should be reviewed by licensees who have large facilities to decommission. An acceptable screening computer code for calculating screening values to demonstrate compliance with the unrestricted dose limits is D and D, Version 1; this was issued on August 20, 1998. Supplemental information on the implementation of the final rule on radiological criteria for license termination was published in the Federal Register (Volume 63, Number 222, Page 64132-64134) on November 18, 1998. This includes the acceptable license termination screening values of common radionuclides for building surface contamination (see **Table 6**).

Table 6. Acceptable License Termination Screening Values of Common Radionuclides for Building Surface Contamination

Radionuclide	Symbol	Acceptable Screening Levels*
Hydrogen-3 (Tritium)	H-3	1.2 x 10 ⁸
Carbon-14	C-14	3.7 x 10 ⁶
Sodium-22	Na-22	9.5 x 10 ³
Sulfur-35	S-35	1.3 x 10 ⁷
Iron-55	Fe-55	4.5 x 10 ⁶
Cobalt-60	Co-60	7.1 x 10 ³
Nickel-63	Ni-63	1.8 x 10 ⁶
Strontium-90	Sr-90	8.7 x 10 ⁶
Cesium-137	Cs-137	2.8 x 10 ⁴
Iridium-192	Ir-192	7.4 x 10 ⁴

* Screening levels are based on the assumption that the fraction of removable surface contamination is equal to 0.1. For cases when the fraction of removable contamination is undetermined or higher than 0.1, users may assure, for screening purposes, that 100% of surface contamination is removable; and therefore the screening levels should be decreased by a factor of 10. Alternatively, users may have site-specific data on the fraction of removable contamination (e. g., within 10% to 100% range) may calculate site-specific screening levels using D and D Version 1, based on site-specific re-suspension factor. For Unrestricted Release (dpm/100 cm²). 1 dpm is equivalent to 0.0167 becquerel (Bq). The screening values represent surface concentrations of individual radionuclides that would be deemed in compliance with the 0.25 mSv/yr (25 mrem/yr) unrestricted released dose limit in **902 KAR 100:019**. For radionuclides in a mixture, the ‘sum of fractions’ rule applies; refer to NRC Draft Guidance DG-4006 for further information on application of the values in this table.

Response from Applicant:

We will notify KDPH, in writing, within 60 days of the decision to permanently cease radioactive material use. (**902 KAR 100:040**)

Reference: KDPH RPS-10 form, ‘Certificate of Disposition of Materials’, is included in **Appendix B**.

Item 12.4 Material Receipt and Accountability

Rule: **902 KAR 100:040, 902 KAR 100:142**

Criteria: Licensees with licensed material must do the following: maintain records of receipt, transfer, and disposal of licensed materials, conduct physical inventories of licensed materials at least every 3 months to account for all sealed sources, tracer materials, and depleted uranium, and maintain inventory records 3 years from the date of the inventory.

Discussion: Licensed materials must be tracked from the time of receipt to disposal in order to ensure accountability, identify when licensed material is lost, stolen, or misplaced, and to ensure that possession limits listed on the license are not exceeded. Physical inventories include locating, verifying the physical presence, and/or accounting for materials by the use of material receipt and transfer records.

Inventory records must contain the following types of information: quantity and kind of licensed material including sealed sources, tracer material on hand (including waste), and depleted uranium in sinker bars; location of each sealed source; date the inventory occurred; and name of individual performing the inventory.

Note: Physical inventory records may be combined with leak test records.

‘Cradle to Grave’ Accountability refers to maintaining the radioactive material from the moment it becomes a part of your organization (whether through creation there, delivered to company, etc) through performing the quarterly inventories (ensuring the material’s location, etc) until it leaves your organization (through shipment, disposal on/off site, etc)

Response from Applicant:

The applicant shall submit a policy for conducting quarterly inventories including a sample inventory record sheet listing byproduct, tracer materials, and depleted uranium, which is compatible with the requirements of KYREG Guidance for Wire Line Service Operations, Use **Item 12.3 Material Receipt and Accountability.**

Item 12.5 Financial Assurance and Recordkeeping for Decommissioning

Rule: 902 KAR 100:042

Criteria: Financial assurance is not required by most well logging or tracer licensees; however, each licensee is obligated to maintain, in an identified location, decommissioning records related to facilities where licensed material is used, stored, or dispatched. Decommissioning records described above are not required at temporary jobsites. Pursuant to **902 KAR 100**, when terminating the license, licensees must transfer records important to decommissioning to either the new licensee before licensed activities are transferred or assigned according to **902 KAR 100** or the agency before the license is terminated.

Discussion: There are two parts to this rule: financial assurance that applies to some licensees and record keeping that applies to all licensees.

902 KAR 100:042, when applicable, requires the applicant to provide financial assurance or a decommissioning funding plan. This is to provide reasonable assurance that, after the technical and environmental components of decommissioning are carried out, unrestricted use of the facilities is possible at the termination of licensed activities. The agency’s primary objective is to ensure that decommissioning will be carried out with minimum impact on the health and safety of the public, occupationally exposed individuals, and the environment. These requirements specify that a licensee either set aside funds for decommissioning activities or provide a guarantee through a third party that funds will be available. Before a license is issued, applicants are required to submit financial assurance or decommissioning funding plan when requesting authorization to possess any sealed or unsealed radioactive material with half-life greater than 120 days exceeding certain the limits. Criteria for this determination is described in **902 KAR 100:042 (11) (2)** .

Most well logging, tracer, and field flood study licensees use only a few of radioisotopes with a half-life greater than 120 days. The most frequently used radioisotopes requiring financial assurance in unsealed form are Hydrogen-3, Carbon-14, and Silver-110 metastable, and for sealed sources, Americium-241. **Table 5** provides a partial list of sealed and unsealed radioisotopes with a half-life greater than 120 days with the corresponding limits. Radioisotopes with half-lives greater than 120 days are listed in Column 1. Column 2 lists the corresponding possession limits of radioisotopes requiring financial assurance. Column 3 lists the corresponding possession limits of unsealed radioisotopes requiring the submittal of a decommissioning funding plan (DFP). These limits apply when only one of these radioisotopes is possessed. Applicants can use the data from **Table 5** or the method given in **Appendix I** to determine if financial assurance is required and the amount that is required when more than one of these radioisotopes is requested.

Table 7. Commonly Used Licensed Materials Requiring Financial Assurance/Decommissioning Funding Plan

Column 1: Radioisotope	Column 2: Limit for F/A (millicuries*)	Column 3: Limit for DFP (millicuries*)
Unsealed Materials		
H-3	1,000	100,000
C-14	100	10,000
Ag-110m	1	100
Sealed Materials		
Am-241	100,000	N/A

*1 millicurie = 37 MBq

NRC Regulatory Guide (RG) 3.66, “*Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72*” dated June 1990, contains approved wording for each mechanism authorized to guarantee or secure funds.

Record Keeping

The requirements for maintaining records important to decommissioning, including the type of information required, are stated in **902 KAR 100:042**. All licensees are required to maintain these records in an identified location until the site is released for unrestricted use. In the event that the licensed activities are transferred to another person or entity, these records shall be transferred to the new licensee before transferring the licensed activities. The new licensee is responsible for maintaining these records until the license is terminated. When the license is terminated, these records shall be transferred to the agency.

902 KAR 100:019 states the all of the records that must be maintained by a licensee important to decommissioning and that they must be transferred or assigned according to **902 KAR 100:019**, if a license is transferred or to the agency, before the license is terminated. Licensees must maintain permanent records on locations where licensed materials are used or stored while the license is in force. These permanent records are important for making future determinations about the release of these locations for unrestricted use (e.g., before the license is terminated). Acceptable permanent records include sketches, written descriptions of specific locations where radioactive material is used or stored, and records of any leaking sealed sources, tracer material spills, contaminated waste storage areas, or other unusual occurrences involving the spread of contamination in or around the licensee’s facilities or field stations. Permanent decommissioning records described above are not required for temporary job site locations.

Response from Applicants:

References: NRC RG 3.66 and Policy and Guidance Directive FC 90-2 (Rev. 1), “*Standard Review Plan for Evaluating Compliance with Decommissioning Requirements*”, dated April 30, 1991.

Item 12.6 Leak Tests

Rule: 902 KAR 100:060

Criteria: KDPH requires testing of sealed sources containing greater than 3.7 MBq (100 microcuries) of beta/gamma or 0.37 MBq (10 microcuries) of alpha radioactive material in order to determine whether there is any radioactive leakage from sealed sources. Requirements for leak tests are based on the type of radiation (beta/gamma/alpha) escaping from the inner capsule. Records of test results must be maintained per **902 KAR 100:060**.

Discussion: KDPH licenses will require the performance of leak tests on sealed sources authorized for well logging at intervals approved by the agency and as specified in the SSD Registration Sheet. The measurement of the leak test sample is a quantitative analysis requiring that instrumentation used to analyze the sample be capable of detecting 185 becquerels (0.005 microcuries) of radioactivity.

Sealed sources containing radioactive material must be leak tested at intervals not to exceed 6 months and DU devices tested at intervals not to exceed 12 months.

Manufacturers, consultants, and other organizations may be authorized by KDPH, NRC, or another Agreement State either to perform the entire leak test sequence for other licensees or to provide leak test kits to licensees. In the latter case, the licensee is expected to take the leak test sample according to the manufacturer's and the kit supplier's instructions and return it to the kit supplier for evaluation and reporting results. Licensees may also be authorized to conduct the entire leak test sequence themselves. **A model leak test program is shown in Appendix Q.**

Response from Applicant:

Leak tests will be performed by an organization authorized by KDPH, the NRC or another Agreement State to provide leak testing services to other licensees; or by the licensee using a leak test kit supplied by an organization licensed by KDPH, the NRC or another Agreement State to provide leak test kits to other licensees according to kit suppliers' instructions.

List the name and license number of organization authorized to perform or analyze leak test (Specify whether KDPH, NRC, or another Agreement State)

An alternate organization may be used to perform or analyze leak test, without amending the license, provided the organization is specifically authorized by KDPH, the NRC or another Agreement State.

OR

We will perform our own leak testing and sample analysis. We will follow the procedures in Appendix Q of KYREGS 'Guidance for Wire Line Service Operations'.

OR

We will submit alternative procedures. (Procedures are attached)

Note: Requests for authorization to perform leak testing and sample analysis will be reviewed on a case-by-case basis and, if approved, KDPH staff will authorize via a license condition. Alternative procedures will be evaluated against **Appendix Q** criteria.

References: NRC Draft Regulatory Guide FC 412-4, "*Guide for the Preparation of Applications for the Use of Radioactive Materials in Leak-Testing Services*", is available from NRC upon request.

Item 12.7 Public Dose

Rule: 902 KAR 100:019, 902 KAR 100:040, 902 KAR 100:142

Criteria: Licensees must do the following: ensure that licensed material will be used, transported, stored, and disposed of in such a way that members of the public will not receive more than 1 mSv (100 mrem) in one year, and the dose in any unrestricted area will not exceed 0.02 mSv (2 mrem) in any one hour, from licensed operations; control and maintain constant surveillance of licensed material when in use and not in storage; and secure stored licensed material from access, removal, or use by unauthorized personnel.

Discussion: Members of the public include persons who work in or may occupy locations where licensed material is used or stored. Employees whose assigned duties do not include the use of licensed material and work in the vicinity where it is used or stored are also included as members of the public. Public dose is controlled, in part, by ensuring that licensed material is secured (e.g., located in a locked area) to prevent unauthorized access or use. Well logging sealed sources and tracer materials are usually restricted by controlling access to the keys needed to gain access to storage locations, including downhole storage bunkers.

Public dose is also affected by the choice of storage and use locations at the field stations and at temporary job sites. Licensed material must be located so that the resulting public dose in an unrestricted area (e.g., an office or the exterior surface of an outside wall) does not exceed 1 mSv (100 mrem) in a year or 0.02 mSv (2 mrem) in any one hour. Applicants should use the concepts of controlling time, distance, and shielding when choosing storage and use locations. Decreasing the time that an individual is exposed, increasing the distance

from the radioactive material, and adding shielding that is appropriate for the specific type of radiation (e.g., brick, concrete, lead, hydrogenous materials, etc.) will reduce the radiation exposure.

Information provided by the manufacturer or vendor on anticipated radiation levels of sealed sources and tracer materials, both inside their respective transport containers and outside the transport container at given distances, is the type of information needed to make public dose calculations. Licensees may assess radiation levels located in adjacent areas to radioactive material either by making calculations or by using a combination of direct measurements and calculations. After obtaining anticipated radiation levels or by making direct radiation

measurements using an appropriate survey instrument, an applicant can use the ‘inverse square’ law to evaluate the effect on the public and use this information to determine operating and emergency procedures for using radioactive materials. See **Appendix O** for an example demonstrating that individual members of the public will not receive doses exceeding the allowable public limits.

If, after making an initial public dose evaluation, a licensee changes the conditions used for the evaluation (e.g., relocates radioactive material within a designated storage area, increases the amount of radioactive materials in storage, changes the frequency radioactive material is in use, or changes the occupancy of adjacent areas), the licensee must perform a new evaluation to ensure that the public dose limits are not exceeded and take corrective action, if required.

Response from Applicant:

No response is required, in this license application, however the licensee’s evaluation of public dose will be examined during an inspection.

See **Appendix O** for examples of methods to demonstrate compliance.

Item 12.8 Maintenance

Rule: 902 KAR 100:142

Criteria: The licensee shall have written procedures for visually inspecting and for maintaining source holders, logging tools, and source handling tools in an operable condition, including labeling. If equipment problems are found, the equipment must be withdrawn from service until repaired. Records of this inspection program are required.

Discussion: Each licensee shall visually check source holders, logging tools, and source handling tools for defects prior to each use to ensure that the equipment is in good working order and that required labeling is present. If defects are found, the equipment must be removed from service until repaired and a record made of the defect and the repairs made prior to returning the equipment for use. At intervals not to exceed 6 months, licensees shall conduct a visual inspection to ensure that no physical damage to equipment is visible and the required labeling is present. Licensees must establish a program for the routine maintenance of source holders, logging tools, inspection tools, source handling tools, storage containers, transport container, injection tools, and uranium sinker bars. If defects are found during the visible inspection or during the routine maintenance, the equipment must be removed from service until repaired and a record made of the defect and any repairs made prior to returning the equipment for use.

Non-routine and special maintenance (e.g., change of O rings on sealed sources or removal of a stuck sealed source) in a manner that could potentially damage or rupture the source, can only be performed by those licensees that have specifically received authorization from the KDPH, NRC or another Agreement State. If defects are found as a result of the inspection and maintenance programs, the equipment must be removed

from service until repairs are made, and a record of the defect must be retained for 3 years after the defect is found.

Response from Applicant: No response required; included in other items.

Item 12.8.1 Daily Maintenance

Rule: 902 KAR 100

Criteria: The licensee must have written procedures for visually inspecting and maintaining source holders, logging tools, and source handling tools for defects prior to use. This visual inspection is necessary to ensure that the equipment remains in good working condition and is labeled as required.

Discussion: 902 KAR 100 requires that logging tools, source holders, and source handling tools be checked visually for defects prior to use to ensure that the equipment is in good working condition and is labeled as required. Labeling requirements are specified in **902 KAR 100**. Instructions in the operating procedures provided to personnel must clearly reflect the regulatory requirement—visual inspections are performed prior to use. Record after the inspection: the date, inspector, equipment involved, any defects found, or repairs made. Equipment that fails the inspection and cannot be repaired must be removed from service and returned only after it is successfully repaired.

The licensee must develop, implement, and maintain procedures for visually inspecting and maintaining source holders, logging tools, and source handling tools.

Response from Applicant:

We have included procedures for conducting daily visual inspection.

OR

Visual daily inspection will be conducted and records maintained in accordance with the criteria listed in ‘Daily Maintenance’ of the KYREGS ‘Guidance for Wire Line Service Operations’ to ensure that well logging equipment is in good working condition and is labeled as required.

Item 12.8.2 Semi-Annual Visual Inspection and Routine Maintenance

Rule: 902 KAR 100:040, 902 KAR 100:142, 10 CFR 21.21

Criteria: Licensees must have written procedures for semiannual visual and routine maintenance of source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars to ensure that the labeling required by **902 KAR 100:019, ‘Kentucky Radiation Protection Regulations’** is legible and that no physical damage to the equipment is visible. Requirements in **10 CFR 21.21** specify, in part, that licensees adopt appropriate procedures to notify the NRC of any equipment that is defective or could result in a substantial safety hazard, and additionally, that management be informed as soon as practicable, within 5 working days, after the completion of the evaluation.

Discussion: Logging supervisors or assistants are expected to conduct visual inspections and provide routine maintenance activities on source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars to ensure that the labeling required by **902 KAR 100:142 (10)** and **902 KAR 100:142 (11)** for sealed sources and for uranium sinker bars is legible, and that no physical damage is visible. If defects are found, the equipment must be removed from service, and a record

must be made, listing: the defects, inspection and maintenance operations performed, and the actions taken to correct the defects. As noted in **902 KAR 100:142 (13)**, instructions for conducting these activities must be included as part of the operating and emergency procedures. Instructions should be tailored to your specific program and to the equipment possessed and used.

Reporting defects, in accordance with **10 CFR 21.21**, is a management responsibility. The specific mechanism or procedures for reporting to the agency need not be covered in instructions to personnel.

Response from Applicant:

We have included procedures for semi-annual visual inspection and routine maintenance of source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars to ensure that the labeling required by **902 KAR 100:142** is legible and that no physical damage is visible.

OR

Semi-annual inspections and routine maintenance will be conducted and records maintained for source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars in accordance with the criteria in ‘Semi-Annual Visual Inspection and Routine Maintenance’ of KYREGS ‘Guidance for Wire Line Service Operations’ to ensure that well logging equipment is in good working condition with no physical damage evident and that required labeling is present

Item 12.8.3 Maintenance Requiring Special Authorization

Rule: 902 KAR 100:142

Criteria: Certain maintenance procedures on sealed sources or holders that contain sealed sources are prohibited, unless a written procedure has been approved and the licensee is specifically authorized by the KDPH, NRC or another Agreement State to perform these operations.

Discussion: Activities that are prohibited, unless a written procedure has been reviewed and approved by KDPH, NRC, or another Agreement State, include:

- Removing a sealed source from a source holder or logging tool
- Preventive maintenance activities on sealed sources or holders that may be necessary when using certain types of logging tools, including removing and replacing O-rings
- Removing a sealed source that is stuck in a source holder or logging tool, e.g., any situation where tools are required to remove the stuck source.

Response from Applicant:

Prohibited activities described in ‘Maintenance Requiring Special Authorization’ of KYREGS ‘Guidance for Wire Line Service Operations’ will not be conducted unless approved by KDPH.

OR

Submit detailed procedures of each different tasks (including source removal procedures) for any prohibited activities, including radiation safety precautions that individuals will be expected to follow when performing these tasks and the minimum qualifications of these individuals

Note: Equipment manufacturers can provide information concerning maintenance and source removal procedures. In some cases, certain maintenance operations should only be performed by the manufacturer or individuals who are licensed by KDPH, NRC, or another Agreement State to provide these services.

Item 12.9 Operating and Emergency Procedures

Rule: 902 KAR 100:019, 902 KAR 100:040, 902 KAR 100:142

Criteria: The licensee must develop, implement, and maintain operating and emergency procedures or submit a summary of the procedures that addresses the important radiation safety aspects of each procedure to the agency as part of the application package. Additionally, if well logging and tracer personnel perform specific operations such as leak-testing, semi-annual inspection and maintenance of equipment, and removal and replacement of a sealed source O-ring, appropriate procedures and instructions for these operations should be included in the applicant's operating and emergency procedures.

Each licensee must develop, implement, and maintain operating and emergency procedures. Operating and emergency procedures' elements must include the items outlined in **902 KAR 100:142 (13)**. The following is provided as a checklist of important items:

- Instructions for handling and using licensed materials, including sealed sources in wells, without surface casing for protecting fresh water aquifers
- Instructions for maintaining security during storage and transportation
- Instructions to keep licensed material under control and under immediate surveillance during use
- Steps to take to keep radiation exposures ALARA
- Steps to maintain accountability during use
- Steps to control access to work sites
- Steps to take and whom to contact when an emergency occurs
- Instructions for using remote handling tools when handling sealed sources, except low-activity calibration sources and radioactive tracer materials
- Methods and occasions for conducting radiation surveys, including surveys for detecting contamination, as required by **902 KAR 100:142 (13)**.
- Procedures to minimize personnel exposure during routine use and in the event of an incident, including exposures from inhalation and ingestion of licensed tracer materials
- Methods and occasions for locking and securing stored licensed materials
- Personnel monitoring, including bioassays, and the use of personnel monitoring equipment
- Transportation of licensed materials to field stations or temporary job sites, packaging of licensed materials for transport in vehicles, placarding of vehicles when needed, and physically securing licensed materials in transport vehicles during transportation to prevent accidental loss, tampering, or unauthorized removal
- Procedures for picking up, receiving, and opening packages containing licensed materials, in accordance with **902 KAR 100:070**.
- Instructions for the use of tracer materials, including how to decontaminate the environment, equipment, and personnel
- Instructions for maintaining records in accordance with the regulations and the license conditions
- Steps for the use, inspection, and maintenance of sealed sources, source holders, logging tools, injection tools, source handling tools, storage containers, transport containers, and uranium sinker bars, as required by **902 KAR 100:142**.
- Actions to be taken if a sealed source is lodged in a well
- Procedures and actions to be taken if a sealed source is ruptured, including actions to prevent the spread of contamination and minimize inhalation and ingestion of licensed materials and actions to obtain suitable radiation survey instruments, as required by **902 KAR 100:142 (see Appendix U)**.
- Instructions for the proper storage and disposal of radioactive waste
- Procedures for laundering contaminated clothing and for decontaminating equipment and vehicles

- Procedures to be followed in the event of uncontrolled release of radioactive tracer material to the environment, including notification of the RSO, the agency, and other state and federal agencies (**Appendix P**).

Discussion: The purpose of operating and emergency procedures is to provide well logging and tracer personnel, including field flood study personnel, with specific guidance for all operations they will perform. Each topic of importance should be included in the operating and emergency procedures and need not be presented in order. Instructions for non-routine operations, for example, inspection and maintenance of well logging and tracer equipment or conducting calibration of survey instruments, should be included as separate appendices in the application.

Operating and emergency procedures need not specify a particular make and model of survey instrument. Procedures should provide sufficient guidance and instruction for each specific type of well logging or associated equipment. For example, you may submit a single operating procedure for using sealed sources, tracer materials, and isotopes used in field flood operations, provided the unique variances in each operation are addressed in the application.

Operating and emergency procedures or a summary of the procedures that addresses the important radiation safety aspects of each must be submitted to the agency for review as a part of the application.

Response from Applicant:

Operating and emergency procedures or an outline or summary as described in **902 KAR 100:019, 902 KAR 100:040 and 902 KAR 100:142** have been attached for agency review.

Item 12.10 Transportation

Rule: 902 KAR 100:070

Criteria: Applicants must develop, implement, and maintain safety programs for transport of radioactive material to ensure compliance with KDPH and Department of Transportation (DOT) regulations.

Discussion: Licensees should consider the safety of all individuals who may either handle or come into contact with transport containers or packages containing licensed material. The primary consideration in packaging licensed material should be to ensure that the package integrity is not compromised during transport and that the radiation levels or removable contamination levels at the package surfaces meet the regulatory requirements of **902 KAR 100:070** and **49 CFR 1723.443 AND 49 CFR173.475**

In all cases, ALARA concerns are addressed prior to, during, and after transporting any radioactive material.

Note: Licensees shipping radioactive waste for disposal must prepare appropriate documentation as specified in **902 KAR 100:070** and **Appendix R**.

Discussion: Ensuring the radioactive materials are properly packaged in labeled containers that are braced and blocked, secured, and away from the driver while the shipping papers are kept in the cab with the driver illustrates some DOT requirements often overlooked by well logging, tracer, and field flood study licensees. During an inspection, the agency uses the provisions of **902 KAR 100:070** and appropriate DOT regulations to examine and enforce transportation requirements applicable to well logging, tracer, and field flood study licensees. **Appendix R** lists major DOT regulations and provides a sample shipping paper.

Response from Applicant:

No response is needed from applicants during licensing phase. This matter will be examined during an inspection.

References: “*A Review of Department of Transportation Regulations for Transportation of Radioactive Materials (1983 revision)*” can be obtained by calling DOT’s Office of Hazardous Material Initiatives and Training at (202) 366-4425.

Item 12.11 Wire Line Service Operations

Item 12.11.1 Drill-to-Stop Large Sealed Sources

Rule: 902 KAR 100:040 and 902 KAR 100:142

Criteria: Licensee must develop and follow instructions to be used by logging personnel when using licensed sealed radioactive sources in drill-to-stop well logging operations. Unlike measurement while drilling (MWD) or logging while drilling (LWD) operations where well logging operations occur concurrent with the drilling operations, drill-to-stop (DTS) well logging operations require that all drilling operations cease and that parts of the drilling apparatus, including all of the drill stem, be removed to provide access to the well bore. The well logging tool containing one or more sealed sources is then lowered into the well bore to obtain information about the well or adjacent oil, gas, mineral, groundwater, or geological formations.

Discussion: Operating and emergency procedures that cover the use of sealed sources in DTS well logging operations must be developed and implemented.

Applicants who request authorization to use sealed sources in DTS well logging operations in well bores without a surface casing should describe the procedures to be followed necessary to ensure that a sealed source does not become lodged in the well bore. Examples of acceptable procedures include:

- Obtaining specific knowledge of the borehole conditions from the drilling team or company
- First running a caliper log to show the hole is open or to find problem areas
- First running a tool without a radioactive source to show it can be freely removed
- Placing a temporary casing in sections of the hole giving problems.

Instructions in DTS well logging activities should include procedures for using appropriate remote handling tools for handling sealed sources. If only certain handling tools are to be used with particular sealed sources, instructions should clearly address which handling tool is required for each specific sealed source.

Response from Applicant:

- We have submitted procedures for conducting Drill-to-Stop well logging operations or an outline or summary that addresses important radiation safety aspects in the operating and emergency procedures.

Item 12.11.2 Measurement While Drilling, Logging While Drilling

Rule: 902 KAR 100:040, 902 KAR 100:142

Criteria: Licensees must develop and follow procedures to be used by logging personnel when using licensed sealed radioactive sources in Measurement While Drilling (MWD) or Logging While Drilling (LWD) well logging operations. MWD or LWD well logging operations occur during the drilling of the well bore and do not require that the drill stem or other equipment be removed from the well. MWD or LWD requires that the well logging tool containing one or more sealed sources be located above the drilling stem to obtain information about the well or adjacent oil, gas, mineral, groundwater, or geological formations while the well

drilling operation continues uninterrupted. Both MWD and LWD activities can be conducted at the same time drilling operations are occurring. Downhole recorded data from MWD or LWD sensors is transmitted to the surface through the use of mud telemetry.

Discussion: Operating and emergency procedures that cover the use of sealed sources in MWD or LWD well logging operations must be developed and implemented. Instructions in MWD and LWD well logging activities should include procedures for using appropriate remote handling tools for handling sealed sources. If only certain handling tools are to be used with particular sealed sources, instructions should clearly address which handling tool is required for each specific sealed source.

Response from Applicant:

- We have submitted procedures for conducting Measurement While Drilling, Logging While Drilling well logging operations or an outline or summary that addresses important radiation safety aspects in the operating and emergency procedures

Item 12.11.3 Energy Compensation Sources

Rule: 902 KAR 100:142 Section 19

Criteria: Energy compensation sources (ECSs) used in well logging operations are low-activity special form singly or doubly encapsulated sources containing less than or equal to 3.7 MBq (100 microcuries) of byproduct material. ECSs are used as reference or calibration standards for stabilizing and calibrating conventional, LWD, or MWD well logging tools.

Discussion: ECSs are not considered well logging sealed sources and are not required to satisfy the requirement for well logging sealed sources. As a result, ECSs are:

- Exempt, in most instances, from leak testing requirements, per **902 KAR 100:142 Section 6(3)(a)**, ECSs requiring leak testing must be tested at intervals not to exceed 3 years.
- Exempt from abandonment requirements when only ECSs less than or equal to 3.7 MBq (100 microcuries) remain in the abandoned tool.
- Exempt from the performance requirements of sealed sources used in well logging operations.
- Exempt from the monitoring requirements during source recovery operations when only ECSs less than or equal to 3.7 MBq (100 microcuries) remain in a well logging tool that is lodged in a well.
- Exempt from all requirements in **902 KAR 100, ‘Kentucky Radiation Protection Regulations’, Part 142, ‘Radiation Safety Requirements for Wireline Service Operations’**, with the exceptions of physical inventory and records of use. Requirements established in other parts of KDPH regulations (e.g., **902 KAR 100:019, ‘Kentucky Radiation Protection Regulations’**) are still applicable to possession and use of byproduct material contained in ECSs.
- If a surface casing is not used to protect fresh water aquifers, see **902 KAR 100:142 Section 19** for applicable requirements.

Response from Applicant:

- We will submit operating and emergency procedures for using and handling energy compensation sources.

OR

- We will submit an outline or summary of the operating and emergency procedures for using and handling energy compensation sources including instructions for leak testing energy compensation sources, if required, at intervals not to exceed 3 years, instructions for conducting physical

inventories at least every 6 months, maintaining records of inventories required by **902 KAR 100-3220** and records of use for energy compensation sources.

OR

We will submit alternative procedures for agency review.

OR

Energy compensation sources will not be used.

Item 12.11.4 Use of Sealed Sources or Neutron Generators in Fresh Water Aquifers

Rule: 902 KAR 100:142

Criteria: The licensee is prohibited from using sealed sources or neutron generators in fresh water aquifers unless the licensee requests and receives written permission from the agency.

Discussion: Use of radioactive materials in fresh water aquifers is a prohibited activity. Authorizing to use sealed sources or neutron generators in fresh water aquifers requires that operating and emergency procedures include the following information:

- Obtaining specific knowledge of the borehole conditions from the drilling team or company
- First running a caliper log to show the hole is open or to find problem areas
- First running a tool without a radioactive source to show it can be freely removed
- Placing a temporary casing in sections of the hole giving problems.

Response from Applicant:

We will not conduct this prohibited activity.

OR

We are requesting authorization for this prohibited activity and have included the required procedures as stated in ‘Use of Sealed Sources or Neutron Generators in Fresh Water Aquifers’ of KYREGS ‘Guidance for Well Logging, Tracer, and Field Flood Study’

Item 12.11.5 Tracer Studies in Single Well Applications

Rule: 902 KAR 100:142

Criteria: Applicants must develop, implement, and maintain safety programs for the use of unsealed material for tracer studies in single wells.

Discussion: Applicants’ operating and emergency procedures should address the following concerns:

- Methods and occasions for conducting radiation surveys
- Methods and occasions for locking and securing tracer materials
- Personnel monitoring and the use of personnel monitoring equipment
- Transportation to temporary job sites and field stations, including the packaging and placing of tracer materials in vehicles, placarding of vehicles, and securing of tracer materials during transportation
- Procedures for minimizing exposure to members of the public and occupationally exposed individuals in the event of an accident
- Maintenance of records at field stations and temporary job sites

- Use, inspection, and maintenance of equipment (injector tools, remote handling tools, transportation containers, etc.)
- Procedures to be used for picking up, receiving, and opening packages containing radioactive material
- Decontamination of the environment, equipment, and personnel
- Notifications of proper personnel in the event of an accident.

Response from Applicant:

No response is required for this section provided that the elements in the ‘Tracer Studies in Single Well Applications’ of KYREGS ‘Guidance for Well Logging, Tracer, and Field Flood Study’ are contained in other sections.

Item 12.11.6 Field Flood and Secondary Recovery Applications (Tracer Studies in Multiple Wells)

Rule: 902 KAR 100:142

Criteria: Applicants must develop, implement, and maintain safety programs for the use of unsealed material for tracer studies in multiple wells (field flood studies). Refer to **Appendix F** in developing step-by-step instructions for tracer personnel in performing field flood tracer studies for multiple wells. Field flood study activities where licensed material is intentionally released into the environment require an environmental assessment (EA) in accordance with the provisions of appropriate United States Code of regulation.

Reference: NUREG/CR-3467, “*Environmental Assessment of the Use of Radionuclides as Tracers in the Enhanced Recovery of Oil and Gas*”, dated November 1983. For copies of NUREG/CR-3467, available at the NRC website: <http://www.nrc.gov>.

Discussion: Applicants should address the following when requesting field flood and secondary recovery applications:

- Agreement with well operator or owner
- Field flood study project design
- Pre-injection phase of the field flood project
- Injection phase
- Post-injection phase
- Emergency procedures
- Reporting and record keeping requirements
- Waste management
- Methods and occasions for conducting radiation surveys
- Methods and occasions for locking and securing tracer materials
- Personnel monitoring and the use of personnel monitoring equipment
- Transportation to temporary job sites and field stations, including the packaging and placing of tracer materials in vehicles, placarding of vehicles, and securing tracer materials during transportation
- Procedures for minimizing exposure to members of the public and occupationally exposed individuals in the event of an accident
- Maintenance of records at field stations and temporary job sites
- Use, inspection, and maintenance of equipment (injector tools, remote handling tools, transportation containers, etc.)
- Procedures to be used for picking up, receiving, and opening packages containing radioactive material
- Decontamination of the environment, equipment, and personnel

- Notifications of proper personnel in the event of an accident.

Response from Applicant:

Field flood studies using tracer materials will not be conducted unless authorized specifically by license conditions.

OR

We are requesting authorization to conduct field flood studies in the enhanced recovery of oil and gas wells using the information provided in Appendix F of the KYREGS ‘Guidance for Well Logging, Tracer, and Field Flood Study’.

Item 12.11.7 Tracer Studies in Fresh Water Aquifers

Rule: 902 KAR 100:142

Criteria: Applicants must develop, implement, and maintain a safety program for using tracer materials in fresh water aquifers. Licensees may not knowingly inject licensed material into a freshwater aquifer unless specifically authorized to do so by the KDPH license.

Discussion: KDPH, in accordance with **902 KAR 100:142**, prohibits the intentional injection of licensed tracer material into a fresh water aquifer unless the individual is specifically authorized by the license to perform this activity. KDPH staff position concerning the intentional injection of licensed tracer material authorized under **902 KAR 100, ‘Kentucky Radiation Protection Regulations’, Part 142, ‘Radiation Safety Requirements for Wireline Service Operations and Subsurface Tracer Studies’** into a fresh water aquifer requires the preparation of an environmental report by the licensee or applicant. Well logging applicants and applicants requesting field flood studies should refer to the appropriate United States Code (**10 CFR Part 51.45**) and prepare an environmental report. Authorizing an applicant to conduct tracer studies in accordance with **902 KAR 100, ‘Kentucky Radiation Protection Regulations’, Part 142, ‘Radiation Safety Requirements for Wireline Service Operations and Subsurface Tracer Studies’** in fresh water aquifers would require NRC’s assessment of an environmental report and a “*finding of no significant impact*” by the NRC staff.

Authorizing field flood studies that require the applicant to intentionally inject licensed tracer material into a fresh water aquifer would require that an environmental report be prepared by the applicant and an environmental assessment be made by an authorized party.

NRC specifies the criteria for categorical exclusions. When one or more of the criteria for a categorical exclusion are satisfied, the applicant or licensee is relieved from the requirements for preparing an environmental impact statement. This then relieves the requirement of preparing an environmental assessment prior to the issuance, amendment, or renewal of licenses authorizing the use of radioactive tracers in well logging procedures authorized under **902 KAR 100, ‘Kentucky Radiation Protection Regulations’, Part 142, ‘Radiation Safety Requirements for Wire Line Service Operations and Subsurface Tracer Studies’**. However, the intentional release of licensed radioactive material directly to the environment as a result of a research or other study is not categorically excluded. NRC specifies in that in special circumstances or on the request of any interested individual or party, an environmental assessment on an action normally covered by a categorical exclusion could be required.

Note: NRC’s completion of an environmental assessment, based on the level of complexity, can require several months to review, approve, and publish in the Federal Register for comments.

Response from Applicant:

We will not knowingly inject tracer material into a fresh water aquifer.

OR

We are requesting authorization to inject licensed radioactive materials into a fresh water aquifer and are providing the reason(s) for this study and procedures to protect the worker(s) and the public.

Note: Tracer and field flood studies require an environmental report.

Radioactive Markers

Item 12.11.8 Radioactive Collar and Subsidence or Depth Control Markers

Rule: 902 KAR 100:142

Criteria: Radioactive markers usually used as pipe collar markers include wires, tape, nails, etc. Applicants can use radioactive markers only where each individual marker contains quantities of licensed material not exceeding the quantities identified in **902 KAR 100:080**. Radioactive markers must be physically inventoried at intervals not to exceed 6 months, as specified in **902 KAR 100:142**.

Discussion: Operating and emergency procedures must include a commitment that radioactive markers can be used only where each individual marker contains quantities of licensed material not exceeding the quantities identified in **902 KAR 100:080**. However, licensees are not restricted to using only one marker, and may use multiple markers in each pipe joint, provided each individual marker (wires, tape, nails, etc.) is not greater than the quantities identified in **902 KAR 100:080**. Additionally, provisions must be included in the operating and emergency procedures to ensure that radioactive markers undergo physical inventories at intervals not to exceed 6 months, as specified in **902 KAR 100:080**.

Note: Subsidence or depth control markers that use quantities greater than those authorized by **902 KAR 100:080** must be approved or registered by the KDPH, NRC or another Agreement State in an SSD Registration Certificate.

Response from Applicant:

We will only use radioactive markers where each individual marker contains only quantities of licensed material not exceeding the quantities identified in **902 KAR 100:080**

OR

We have submitted procedures for using radioactive markers that in excess of quantities listed in **902 KAR 100:080**.

Item 12.11.9 Neutron Accelerators using Licensed Material

Rule: 902 KAR 100:142

Criteria: Applicants authorized to use a neutron generator (particle accelerator) containing a tritium source, should include operating and emergency procedures for the proper handling and use of the accelerator targets or tubes containing radioactive materials.

Discussion: Neutron generators (accelerators) are used in the well logging industry as a source of neutrons. Most accelerators use tritium gas sealed in a glass tube or plated on a target or disc. Neutron generator target sources, in most instances, contain less than 1,110 GBq (30 curies) of tritium.

Neutron generator tubes are not considered well logging sealed sources and are not required to satisfy the requirement for well logging sealed sources. As a result, neutron generator tubes containing less than 1,110 GBq (30 curies) of tritium are:

- Exempt from abandonment requirements
- Exempt from leak test requirements
- Exempt from the performance requirements of sealed sources used in well logging operations
- Not exempt if a tritium neutron generator for target source is greater than 1,110 GBq (30 curies) or is used in a well without a surface casing to protect fresh water aquifers.

Applicants using a neutron generator (particle accelerator) should include handling procedures that address contamination. Operating and emergency procedures should instruct individuals in the handling of contamination resulting from the routine use, initial installation, replacement, or accidental damage of the targets or glass tubes. Refer to **902 KAR 100:142** for applicable requirements for using neutron generators.

Response from Applicant:

We will not use neutron generators (accelerators) in our well logging operations.

OR

We will use neutron generators (accelerators) in accordance with the criteria in ‘Neutron Accelerators using Licensed Material’ of KYREGS ‘Guidance for Wire Line Service Operations’.

Item 12.11.10 Depleted Uranium Sinker Bars

Rule: 902 KAR 100:050, 902 KAR 100:142

Criteria: Depleted uranium sinker bars are both generally licensed and specifically licensed. Most well logging licensees acquire depleted uranium sinker bars under the provisions of **902 KAR 100:050** and then file KDPH form, ‘Registration Certificate — Use of Depleted Uranium Under General License’. Specifically licensed material must be physically inventoried and visually inspected for labeling and physical damage.

Discussion:

Depleted Uranium Sinker Bars Authorized Under General License:

Certain devices are authorized by KDPH for distribution to persons who are generally licensed for the use of certain industrial products or devices containing depleted uranium for the purpose of providing a concentrated mass in a small volume. Uranium sinker bar devices can be acquired by the users under the provisions of **902 KAR 100:142** without obtaining a specific license from KDPH; however, when acquired under the provisions of a general license, individuals must file KDPH form, ‘Registration Certificate — Use of Depleted Uranium Under General License’.

Generally licensed sinker bars are exempt from **902 KAR 100**, ‘Kentucky Radiation Protection Regulations’, Part 19. Regulatory requirements that apply to such devices possessed under a general license are stated in **902 KAR 100:050**. While operating under the provision of a general license for these types of devices, general licensees must:

- Not introduce uranium sinker bars into a chemical, physical, or metallurgical treatment or process, except as a treatment for restoration of any plating or covering
- Not abandon uranium sinker bars

- Transfer only to individuals authorized under the provisions of **902 KAR 100:040 Section 12 and 902 KAR 100:022**
- Notify the agency within 30 days of the transfer of depleted uranium sinker bars.

Depleted Uranium Sinker Bars Authorized under a Specific License:

While operating under the provision of a specific license for these types of devices, specific licensees must:

- Physically inventory the uranium sinker bars at intervals not to exceed 6 months.
- Visually inspect before use for proper labeling, “*CAUTION RADIOACTIVE DEPLETED URANIUM*” and “*NOTIFY CIVIL AUTHORITIES (or COMPANY NAME) IF FOUND*”, at intervals not to exceed 6 months.
- Visually inspect for physical damage and conduct routine maintenance at intervals not to exceed 6 months, as specified in **902 KAR 100:142 Section 11**.
- Remove bars from use if found defective, until repaired or disposed.
- Record information specified in **902 KAR 100:142 Section 11(2)**.

Response from Applicant:

Depleted uranium sinker bars will be obtained under the provisions of a general license (**902 KAR 100:050**) and the appropriate KDPH form will be filed, as required.

OR

Depleted uranium sinker bars will not be obtained under the provisions of a general license (**902 KAR 100:050**).

AND

Uranium sinker bars will be possessed and inspected as specified in **902 KAR 100:142 Section 11**.

AND

We wish to request _____ kilograms of materials

OR

Depleted uranium sinker bars will not be used.

Item 14: Waste Management

Rule: 902 KAR 100:021

Criteria: Radioactive waste must be disposed of in accordance with regulatory requirements and license conditions and/or transferred to an authorized recipient. Authorized recipients are the original manufacturer, distributor, a commercial firm licensed by KDPH, NRC, or another Agreement State to accept radioactive waste from other persons, or in the case of sealed sources, transferred to another specific licensee authorized to possess the licensed material (i.e., a transferees' license specifically authorizes the same radionuclide, chemical or physical form, and in most instances, the same use). Records of transfer and waste disposal must be maintained per **902 KAR 100:021 Section 11**.

Before transferring any radioactive material, including radioactive waste, a licensee must verify that the recipient is properly authorized to receive the specific type of material using one of the methods described in **902 KAR 100-570**. In addition, all packages containing radioactive waste must be prepared and shipped in accordance with KDPH and DOT regulations. Records of transfer and disposal must be maintained as required by **902 KAR 100:040 section 12** and **902 KAR 100:022** .

Discussion: Radioactive waste generated when conducting licensed activities may include: sealed sources, used or unused radioactive tracer materials, and unusable items contaminated with radioactive tracer materials (e.g., absorbent paper, gloves, bottles, etc.). Unsealed radioactive waste must be stored in strong, tight containers (e.g., thick plastic bags, boxes, barrels, etc.) to prevent the spread of contamination, and sealed sources should be stored in their corresponding transport containers or in a downhole storage bunker until their disposal.

The integrity of the radioactive waste containers must be assured, and the containers, while in storage, must have the appropriate warning label specified in **902 KAR 100:021(8)**. Radioactive waste must be secured against unauthorized access or removal. Depending on the radioactive half-life of the material, KDPH requires disposal of well logging sealed sources and tracer materials generated at licensees' facilities by one or more of the following methods:

Tracer Material with a Half-Life of 120 Days or Less:

- Decay-in-storage (DIS)
- Transfer to an authorized recipient
- Release into sanitary sewerage

- Obtaining prior approval from KDPH of any alternate method
- Release in effluents to unrestricted areas, other than into sanitary sewerage
- Incineration.

Tracer Material with a Half-Life Greater Than 120 Days:

- Transfer to an authorized recipient
- Release into sanitary sewerage
- Extended interim storage
- Obtaining prior approval from KDPH of any alternate method
- Release in effluents to unrestricted areas, other than into sanitary sewerage
- Incineration.

Sealed Sources with a Half-Life of 120 Days or Less:

- Transfer to an authorized recipient
- DIS
- Extended interim storage.

Sealed Sources with a Half-Life Greater Than 120 Days:

- Transfer to an authorized recipient.

Licensees may choose any one or more of these methods to dispose of their radioactive waste. The agency's experience indicates that most well logging tracers are stored or disposed of by a combination of methods, transfer to an authorized recipient and DIS being the most frequently used. Applicants requesting authorization to dispose of radioactive tracer waste by incineration should first refer to NRC's Policy and Guidance Directive PG 8-10, "*Disposal of Incinerator Ash as Ordinary Waste*", dated January 1997, for guidance. Applicants should note that compliance with KDPH regulations does not relieve them of their responsibility to comply with any other applicable local, state, or federal regulations. Some types of radioactive waste used in tracer operations and in 'labeled frac sands' may include additional chemical hazards. This type of waste is designated as 'mixed waste' and requires special handling and disposal.

Applicants should describe in detail their program for management and disposal of radioactive waste, including mixed waste, if applicable. A waste management program should include procedures for handling waste; specify the requirements for safe and secure storage; and describe how to characterize, minimize, and dispose of all types of radioactive waste, including, where applicable, mixed waste. Appropriate training should be provided to waste handlers. **902 KAR 100:021** requires, in part, that licensees maintain all appropriate records of disposal of radioactive waste. The U.S. Environmental Protection Agency (EPA) issued guidance for developing a comprehensive program to reduce hazardous waste that, in many instances, may also include radioactive waste as a contaminant. NRC transmitted these guidelines to licensees in NRC IN-94-23, "*Guidance to Hazardous, Radioactive, and Mixed Waste Minimization Program*", dated March 1994.

Disposal By Decay-in-Storage (DIS)

The agency has concluded that materials with half-lives of less than or equal to 120 days are appropriate for DIS. The minimum holding period for decay is ten half-lives of the longest-lived radioisotope in the waste with a half-life of 120 days or less. Such waste may be disposed of as ordinary trash if radiation surveys (performed in a low background area and without any interposed shielding) of the waste at the end of the holding period indicate that radiation levels are indistinguishable from background. All radiation labels must be defaced or removed from containers and packages prior to disposal as ordinary trash. If the decayed waste is compacted, all labels that are visible in the compacted mass must also be defaced or removed.

Applicants should assure that adequate space and facilities are available for the storage of such waste. Licensees can minimize the need for storage space, if the waste is segregated according to physical half-life. Waste containing radioisotopes with physical half-lives 120 days or less may be segregated and stored in a container and allowed to decay for at least ten half-lives based on the longest-lived radioisotope in the container. Waste management procedures should include: methods of segregating waste by physical half-lives of 120 days or less, greater than 120 days, methods of surveying waste prior to disposal to confirm that waste above background levels is not inadvertently released, and maintenance of records of disposal. Disposal records for DIS should include the date when the waste was put in storage for decay, date when ten half-lives of the longest-lived radioisotope had transpired, date of disposal, and results of final survey taken prior to disposal as ordinary trash. Additionally, a model procedure for disposal of radioactive waste by DIS, which incorporates the above guidelines, is provided in **Appendix S**.

Release Into Sanitary Sewerage

902 KAR 100:021 authorizes disposal of radioactive waste by release into sanitary sewerage if each of the following conditions is met:

- Material is readily soluble (or is easily dispersible biological material) in water
- Quantity of licensed material that the licensee releases into the sewer each month averaged over the monthly volume of water released into the sewer does not exceed the concentration specified in **10 CFR 20 Appendix B**.
- If more than one radioisotope is released, the sum of the ratios of the average monthly discharge of a radioisotope to the corresponding limit in **10 CFR 20 Appendix B** cannot exceed unity
- Total quantity of licensed material released into the sanitary sewerage system in a year does not exceed 185 GBq (5 Ci) of H-3, 37 GBq (1 Ci) of C-14, and 37 GBq (1 Ci) of all other radioisotopes combined.

Licensees are responsible to demonstrate that licensed materials discharged into the sewerage system are indeed readily dispersible in water. NRC IN 94-07, "*Solubility Criteria for Liquid Effluent Releases to Sanitary Sewerage Under the Revised 10 CFR 20*", dated January 1994, provides the criteria for evaluating solubility of liquid waste. Careful consideration should be given to the possibility of re-concentration of radioisotopes that are released into the sewer. NRC alerted licensees to the potentially significant problem of re-concentration of radionuclides released to sanitary sewerage systems in NRC IN 84-94, "*Reconcentration of Radionuclides Involving Discharges into Sanitary Sewerage Systems Permitted Under 10 CFR 20.203 (now 10 CFR 20.2003)*", dated December 1984.

Applicants electing to use this type of disposal should provide procedures that will ensure that all releases of radioactive waste into the sanitary sewerage meet the criteria stated in **902 KAR 100:021** and do not exceed the monthly and annual limits specified in KDPH regulations. Licensees are required to maintain accurate records of all releases of licensed material into the sanitary sewerage. A model program for disposal of radioactive waste via sanitary sewer is described in **Appendix S**.

Note: 902 KAR 100:021, 'Kentucky Radiation Protection Regulations' prohibits the disposal of radioactive materials via a sewerage treatment facility, septic system, or leach field owned or operated by the licensee.

Transfer to an Authorized Recipient

Licensees may transfer radioactive waste to an authorized recipient for disposal. However, it is the licensee's responsibility to verify that the intended recipient is authorized to receive the radioactive waste prior to making any shipment. Waste generated at well logging and tracer facilities generally consists of low specific activity (LSA) material. The waste must be packaged in DOT-approved containers for shipment, and each container must identify the radioisotopes and the amounts contained in the waste. Additionally, packages must comply with the requirements of the particular burial site's license requirements. Each shipment must comply with all applicable KDPH and DOT requirements. In some cases, the waste handling contractor may provide additional guidance and requirements to licensees for packaging and transportation; however, the licensee is ultimately responsible for ensuring compliance with all applicable regulatory requirements.

The shipper must provide all information required in KDPH form, 'Uniform Low-Level Radioactive Waste Manifest' and transfer this recorded manifest information to the intended recipient. Each shipment manifest must include a certification by the waste generator. Each person involved in the transfer for disposal and disposal of waste, including waste generator, waste collector, waste processor, and disposal facility operator, must comply with NRC's Uniform Low-Level Radioactive Waste Manifest.

Licensees should implement procedures to reduce the volume of radioactive waste for final disposal in an authorized low-level radioactive waste (LLW) disposal facility. These procedures include volume reduction by segregating, consolidating, compacting, or allowing certain waste to decay in storage. Waste compaction or other treatments can reduce the volume of radioactive waste, but such processes may pose additional radiological hazards (e.g., airborne radioactivity) to workers and members of the public. The program should include adequate safety procedures to protect workers, members of the public, and the environment.

Applicants may request alternate methods for the disposal of radioactive waste generated at their facilities. Such requests will be handled on a case-by-case basis and require that the applicant provide additional site-specific information. In most instances, requests for alternate methods of disposal must describe the types and quantities of waste containing licensed material, physical and chemical properties of the waste that may be important to making a radiological risk assessment, and the proposed manner and conditions of waste disposal. Additionally, the applicant must submit its analysis and evaluation of pertinent information specific to the affected environment, including the nature and location of other affected facilities, and provide an outline of its procedures to ensure that radiation doses are maintained ALARA and within KDPH limits. Because of the difficulties and costs associated with disposal of sealed sources (e.g., sealed sources containing Americium-241) applicants should preplan disposal. Applicants may want to consider contractual arrangements with the source supplier as part of a purchase agreement.

Extended Interim Storage

Prior to requesting extended interim storage of radioactive waste materials, and this only as a last resort, licensees should exhaust all possible alternatives for disposal of radioactive waste. The protection of occupationally exposed workers or the public is enhanced by disposing of radioactive waste, rather than storing it. In addition, licensees may find it more economical to dispose of radioactive waste than to store it on-site. As available burial ground capacity decreases, cost of disposal of radioactive waste most likely will continue to increase. Other than DIS, LLW should be stored only when disposal capacity is unavailable and for no longer than is necessary. NRC IN 90-09, "*Extended Interim Storage of Low-Level Radioactive Waste by Fuel Cycle and Materials Licensees*", dated February 1990 and NRC IN 93-50, "*Extended Storage of Sealed Sources*", dated July 1993, provides guidance to KDPH licensees for requesting an amendment to authorize extended interim storage of both sealed and unsealed LLW.

Response from Applicant:

We will use Appendix S of KYREGS' Guidance for Well Logging, Tracer, and Field Flood Study'.

OR

We will use Decay-In-Storage model waste procedure in Appendix S of KYREGS, 'Guidance for Well Logging, Tracer, and Field Flood Study'.

AND/OR

We will use Disposal of Liquids Into Sanitary Sewage (**902 KAR 100:021**) model waste procedure in Appendix s of KYREGS, 'Guidance for Wire Line Services and Tracer, and Field Flood Study'.

OR

We have attached our procedures for waste collection, storage, and disposal by any of the authorized methods and request authorization for the methods described

Note: Applicants do not need to provide information to the agency if they plan to dispose of LLW via transfer to an authorized recipient. Alternative responses will be reviewed using the criteria listed above.

References: A copy of all of the below is available on the NRC's website at: <http://www.nrc.gov>.

1. NRC Policy and Guidance Directive PG 8-10, "*Disposal of Incinerator Ash as Ordinary Waste*", dated January 1997
2. NRC Policy and Guidance Directive PG 94-05, "*Updated Guidance on Decay-In-Storage*", dated October 1994
3. NRC Information Notice 94-23, "*Guidance to Hazardous, Radioactive, and Mixed Waste Minimization Program*", dated May 1994
4. NRC Information Notice 94-07, "*Solubility Criteria for Liquid Effluent Releases to Sanitary Sewerage Under the Revised 10 CFR 20*", dated January 1994
5. NRC Information Notice 84-94, "*Reconcentration of Radionuclides Involving Discharges into Sanitary Sewerage Systems Permitted Under 10 CFR 20.203 (now 10 CFR 20.2003)*", dated December 1984
6. NRC Information Notice 90-09, "*Extended Interim Storage of Low-Level Radioactive Waste by Fuel Cycle and Materials Licensees*", dated February 1990
7. NRC Information Notice 93-50, "*Extended Storage of Sealed Sources*", dated July 1993.

Item 15: Certification

Individuals acting in a private capacity are required to date and sign KDPH form, 'Application for a Radioactive Material License Authorizing the Use of Sources in Wire Line Service Operations'. Otherwise, representatives of the corporation or legal entity filing the application should date and sign KDPH form, 'Application for a Radioactive Material License Authorizing the Use of Sources in Wire Line Service Operations'. Representatives signing an application must be authorized to make binding commitments and to sign official documents on behalf of the applicant. As discussed previously in 'Management Responsibility', signing the application acknowledges management's commitment and responsibilities for the radiation protection program. The agency will return all unsigned applications for proper signature.

Response from Applicant:

The applicant understands that all statements and representations made in the application are binding upon the applicant

Note:

- It is a violation to make a willful false statement or representation on applications or correspondence (**902 KAR 100:170**).
- When the application references commitments, those items become part of the licensing conditions and regulatory requirements.

Appendix A
KDPH Form,
‘Application for a Radioactive Material License



Application for a Kentucky Radioactive Materials License
Radiation Health Branch, Department for Public Health
Cabinet for Health and Family Services

RPS-7
6/2011

Completed applications must be filed with Radiation Health Branch, Cabinet for Health and Family Services, 275 East Main Street, Mailstop HS1C-A, Frankfort, KY 40621, Tel: 502-564-3700, Fax: 502-564-1492
 Application is for one of the following:

New License ⁽¹⁾ Check. _____	Amendment in Entirety ⁽¹⁾ of License No. _____	Amendment to ^(2, 3) License No. _____	Renewal of ^(2, 3) License No. _____
---	---	--	--

(1) All sections must be completed (2) Complete all applicable sections & section 15 (3) Amendments & renewals cannot be combined

1. Applicant's Name and Mailing Address

2. Street address(es) where radioactive material will be Used (no P.O. Boxes)

3. Telephone Number

4. Person to be contacted and listed as contact person

5. Individual(s) and Title(s) who will use or directly supervise use of radioactive material

6. Radiation Safety Officer (one person)

Training and experience required for each user named in Item 5 and for the Radiation Safety Officer in Item 6. For the RSO, duties and responsibilities of the RSO and updated organizational chart are required and if necessary, a signature authorization form.

7. Licensed Material

Element & Mass Number A	Chemical and/or Physical Form B	Manufacturer Name & Model Number (if sealed source) C	Maximum activity (millicuries) per sealed source <u>OR</u> maximum activity possessed at any one time D	Maximum number of sealed source/device combinations possessed at any one time E

Describe use of radioactive material (Should be keyed to material in Subitem A above. For specific make & model of sealed source/device combinations in Subitem E above, state maximum number possessed at any one time)

8. Radiation Detection Instruments

<u>Manufacturer</u>	<u>Model</u>	<u>Number Available</u>	<u>Radiation Detected (alpha, beta, gamma, neutron)</u>	<u>Sensitivity Range</u>
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9. a) Calibrated by Service Company
(Name, Address, and Frequency)

b) Calibrated by Applicant
(Attach procedures describing method and standards used)

10. Personal Monitoring Devices

Type	Supplier	Exchange Frequency
<input type="checkbox"/> (1) Film Badge <input type="checkbox"/> (2) TLD <input type="checkbox"/> (3) OSLD <input type="checkbox"/> (4) Other (specify)		<input type="checkbox"/> Monthly <input type="checkbox"/> Bi-monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Other (specify)

11. Facilities and Equipment. Describe the facilities, remote handling equipment, shielding, fume hoods, etc. Attach a sketch of the facility indicating the location of any radioactive materials (i.e. fixed gauges, storage areas, etc).

12. Radiation Protection Program. Describe the radiation protection program as appropriate for the material to be used including the duties and responsibilities of the Radiation Safety Officer, control measures, bioassay procedures, day-to-day general safety instruction to be followed, etc. If sealed sources are to be possessed, describe leak test procedures or if kit is used specify the manufacturer, model number of kit and person performing test. If radiation detection instruments are to be calibrated in-house or leak test swipes analyzed, submit detailed procedures and methods.

13. Training and Experience of Users. Submit the formal training of each individual named in Item 5 and 6 indicating the name of persons or institutions providing the training, duration of training, and when training received in the areas of:

- A) Principles and practices of radiation protection.
- B) Radioactivity measurement standardization and monitoring techniques and instruments.
- C) Mathematics and calculations basic to the use and measurement of radioactivity.
- D) Biological effects of radiation.

14. Waste Disposal. Describe the methods which will be used for disposing of radioactive waste.

15. Certification. The applicant understands that all statements and representations made in the application are binding upon the applicant.

The applicant and any official executing this certification on behalf of the applicant, named in Item 1, certify that this application is prepared in conformity with Kentucky Cabinet for Health and Family Services Administrative Regulations 902 KAR 100, and that all information contained herein, is true and correct to the best of their knowledge and belief.

Signature of Certifying Management Official Type/Printed Name Title Date

Appendix B
Certificate of Disposition of Material



RPS-10 - DISPOSITION OF RADIOACTIVE MATERIAL

RPS-10 Rev. 3/2011

Radiation Health Branch
Department for Public Health
Cabinet for Health and Family Services
275 East Main Street
Mailstop HS1C-A
Frankfort, KY 40621

1. Licensee Name _____

2. Address _____

3. Radioactive Material License Number _____

4. Expiration Date _____

5. Radioactive Material Disposition for (check one only) [] Transfer [] Termination (see 8 below).

6. Check one of the following and provide any requested information

[] A. No radioactive material has been procured and/or possessed by the licensee under this license.

[] B. All licensed activities have ceased and all radioactive material procured and/or possessed by the licensee has been transferred to the following licensee/supplier:

Name _____

Address _____

License Number _____

Date Transferred _____

[] C. All licensed activities have ceased and all radioactive material has been disposed of in the following manner. (Describe specific disposal procedures. Use reverse side of form if necessary) _____

7. If unsealed sources or a leaking sealed source of radioactive material had been used, submit a copy of a radiation survey conducted to determine whether any contamination remains at location(s) authorized by license.

[] Survey not required. (Explain) _____

[] Survey report attached.

8. If the license is to be terminated a Low Level Radioactive Waste Form Must Be Submitted.

This form is on the Radiation Health Branch Website at http://chfs.ky.gov/dph/radiation.htm

9. Form must be signed and dated by person authorized to act on behalf of licensee.

I hereby certify that the information provided is true and correct to the best of my knowledge and belief.

Signature

Date

Typed/Printed Name

Title

Appendix C
Sample Delegation of Authority to RSO

MODEL DELEGATION OF AUTHORITY TO THE RSO

(to be printed on company letter head)

Date: _____(required)

Memo To: (write in name & title of person being granted RSO authority)

From: (write in name & title of Senior Management official granting RSO authority).

(e.g. President, Chief Executive Officer)

Subject: Delegation of Authority to the Radiation Safety Officer

You have been appointed Radiation Safety Officer for license number _____. You are responsible for ensuring the safe use of radiation. You are responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; stopping unsafe activities; and ensuring compliance with the regulations 902 KAR 100 and compliance with the terms and conditions of the license and commitments contained therein. You are hereby delegated the authority necessary to meet those responsibilities, including prohibiting the use of radioactive material by employees who do not meet the necessary requirements and shutting down operations where justified by radiation safety. You are required to notify management of situations where staff are not cooperating and not addressing radiation safety issues. In addition, you are free to raise issues with the Radiation Health Branch, Frankfort, KY at anytime.

Signature and Title of Management

I, _____ hereby I accept the above delegated authority.
(print name)

Signature of the Radiation Safety Office

Appendix D
Sample Signature Authorization Letter

MODEL SIGNATURE AUTHORIZATION FORM

(To be submitted on company letter head)

Date: _____ (required)

Memo To: (write in name & title of person being granted Signature Authority for license)

(e.g., RSO, EH&S Supervisor, etc.)

From: (write in name & title of Senior Management official granting Signature Authorization)

(e.g. Chief Executive Officer, President, etc.)

Subject: Signature Authorization for License Number _____

I hereby delegate authority to you for making commitments and signing amendment requests to the Kentucky radioactive materials license for (write in name and address of license _____) on behalf of senior management. As a member of management, I recognize the radioactive materials license is a legal document that includes the application and all approved amendments. Furthermore, only management can obligate the institution and management is held accountable for the commitments in the license. In addition, I acknowledge that only a member of management has authority to provide necessary resources to achieve regulatory compliance. Necessary resources include finance, personnel, and physical plant.

Signature and Title of Management

I, _____ hereby I accept the above delegated authority.
(print name)

Signature of the authorized individual

Appendix E
Information Needed for Transfer of
Control Application

FORM RPS-12, TRANSFER OF CONTROL OF SPECIFIC RADIOACTIVE MATERIALS LICENSE



Kentucky Radiation Health Branch
Department for Public Health
Cabinet for Health and Family Services
275 East Main Street
Mailstop HS1C-A
Frankfort, KY 40621

RPS-12
Rev. 01/2015

<http://www.chfs.ky.gov/dph/radioactive.htm>

1. Current licensee requesting permission to transfer control of its existing specific license ("transferor"):

Licensee Name: _____

Address: _____

License No. ____ Amendment No. __ Expiration Date: __

The Radiation Health Branch (RHB) reviews requests for transfer of license control on a case-by-case basis. RHB may require the entity seeking to gain control of the existing license (the "transferee") to apply for brand new specific license and require the termination of the existing specific license based upon the following: 1) Attempted transfer of license control before prior notification and written consent of RHB, 2) license initially granted more than five (5) years previously and 3) license not Amended in Entirety within the last five (5) in accordance with 902 KAR 100:040. (see <http://www.lrc.ky.gov/kar/902/100/040.htm>)

2. Entity requesting permission from RHB to assume control of above specific license (Transferee)

Transferee Name: _____

Address: _____

Transferee is registered with the Kentucky Secretary of State's Office: Yes No

If yes, under what name: _____

If no, please explain why not: _____

All corporations (profit, non-profit & professional service), limited liability companies (profit, non-profit & professional service), limited partnerships (filed under 2006 Act), limited liability limited partnerships and business trusts are required by law to register with the Kentucky Secretary of State and to file an annual report by June 30th of each year (see <http://www.sos.ky.gov/business/filings/>)

3. I do hereby declare under penalty of perjury that the foregoing information contained in the following "Transfer of Control Application" is true and correct.

Signature & Title of Licensee Management Typed/Printed Name Date

Signature & Title of Transferee Management Typed/Printed Name Date

Information Needed for Transfer of Control Application

According to 902 KAR 100:040. General provisions for specific licenses. Section 11. Inalienability of Licenses. A license issued or granted under 902 KAR Chapter 100 or right to possess or utilize radioactive material granted by a license issued under 902 KAR Chapter 100 shall not be transferred, assigned, or otherwise disposed of, through transfer of control of a license to a person unless the Cabinet, after securing full information, finds that the transfer is in accordance with the requirements of 902 KAR Chapter 100 and gives its consent in writing (see <http://www.lrc.ky.gov/kar/902/100/040.htm>). Licensees must provide full information and obtain the Radiation Health Branch' (RHB's) prior written consent before transferring control of the license; some licensees refer to this as "transferring the license." Provide the following information concerning changes of control by the applicant (licensee and/or transferee, as appropriate). If any items are not applicable, so state.

- 1) The new name of the licensed organization. If there is no change, the licensee should so state.
- 2) The new licensee contact and telephone number(s) to facilitate communications.
- 3) Any changes in personnel having control over licensed activities (e.g., officers of a corporation) and any changes in personnel named in the license such as radiation safety officer (RSO), authorized users, or any other persons identified in previous license applications as responsible for radiation safety or use of licensed material. The licensee should include information concerning the qualifications, training, and responsibilities of new individuals. If a change is RSO is required, submit a copy of the new RSO's qualifications including course certificates along with the RSO Delegation of Authority, RSO Duties and Responsibilities, Organizational Chart with respect to the RSO and if required, Signature Authorization for the RSO, all signed and dated by a member of senior management of the transferee.
- 4) An indication of whether the transferor will remain in non-licensed business without the license.
- 5) A complete, clear description of the transaction, including any transfer of stocks or assets, mergers, etc., so that legal counsel is able, when necessary, to differentiate between name changes and transferring control.
- 6) A complete description of any planned changes in organization, location, facility, equipment, or procedures (i.e., changes in operating or emergency procedures).
- 7) A detailed description of any changes in the use, possession, location, or storage of the licensed materials. Include a copy of the most recent six (6) month physical inventory of all sealed sources and devices possessed by the licensee and provide proof of disposition in the form of a completed RPS-10, Disposition of Radioactive Materials for any sealed sources and devices that are listed in conditions 6-9 on the license which do not appear on the most recent physical inventory.
- 8) Any changes in organization, location, facilities, equipment, procedures, or personnel that would require a license amendment even without transferring control.
- 9) An indication of whether all surveillance items and records (e.g., calibrations, leak tests, surveys, inventories, and accountability requirements) will be current at the time of transfer. Provide a description of the status of all surveillance requirements and records.
- 10) Confirmation that all records concerning the safe and effective decommissioning of the facility, pursuant to 902 KAR 100:042. Decommissioning and financial surety. (see <http://www.lrc.ky.gov/kar/902/100/042.htm>); public dose; and waste disposal by release to sewers, incineration, radioactive material spills, and on-site burials, have been transferred to the new licensee, if licensed activities will continue at the same location, or to the RHB for license terminations.
- 11) A description of the status of the facility, specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for the decontamination of the facility or site?
- 12) A description of any decontamination plans, including financial assurance arrangements of the transferee, as specified in 902 KAR 100:042. Decommissioning and financial surety. (see <http://www.lrc.ky.gov/kar/902/100/042.htm>). Include information about how the transferee and

transferor propose to divide the transferor's assets, and responsibility for any cleanup needed at the time of transfer.

- 13) Confirmation that the transferee agrees to abide by all commitments and representations previously made to RHB by the transferor. These include, but are not limited to: maintaining decommissioning records required by 902 KAR 100:042, Section 11. Financial Assurance and Recordkeeping for Decommissioning for Radioactive Material; implementing decontamination activities and decommissioning of the site; and completing corrective actions for open inspection items and enforcement actions.
 - a. With regard to contamination of facilities and equipment, the transferee should confirm, in writing, that it accepts full liability for the site, and should provide evidence of adequate resources to fund decommissioning; or the licensee should provide a commitment to decontaminate the facility before transferring control.
 - b. With regard to open inspection items, etc., the transferee should confirm, in writing, that it accepts full responsibility for open inspection items and/or any resulting enforcement actions; or the transferee proposes alternative measures for meeting the requirements; or the licensee provides a commitment to close out all such actions with RHB before license transfer.
- 14) Documentation that the licensee and the transferee agree to transferring control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.
- 15) A commitment by the transferee to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license. If not, the transferee must provide a description of its radiation safety program to ensure compliance with the license and the regulations.

Completed copies of the RPS-12 form along with responses to the above fifteen (15) questions in the transfer of control application must be submitted in to the following address:

Kentucky Radiation Health Branch
275 East Main Street
Mailstop HSIC-A
Frankfort, KY 40621

There is no fee associated with the transfer of control of an existing specific license provided no amendments are required for RHB to approve the transfer. However, if RHB deems that an amendment to the license is required based on the information provided by either the licensee or transferee, a check for the amount specified in 902 KAR 100:012 (see <http://www.lrc.state.ky.us/kar/902/100/012.htm>), must be submitted along with the completed transfer of control application. For additional information or assistance with the transfer of control process, please call RHB at (502) 564-3700 during the hours of 8:00 AM to 4:00 PM.

Appendix F
Field Flood Studies/Enhanced Recovery
of Oil and Gas Wells

Field Flood Studies/Enhanced Recovery of Oil and Gas Wells

A formal contractual agreement with well operator or owner should specify control points at which samples will be taken, establish criteria for setting minimum sample requirements, and confirm the willingness of the client company to abide by effluent restrictions and undertake remedial action, if required. The following is an example: samples of recovered fluids or gas will be collected and measured according to the established sampling schedule and appropriate remedial action will be taken if accidents or incidents occurred that may result in the release of licensed materials to the environment. For example, if the concentration in the recovered fluid or gas approaches or exceeds the design limits, remedial action should be taken, such as reducing the injection pressure, temporarily shutting in the well, or diluting with non-tracer-bearing gas.

Planning Stage

Reservoir Information

Describe the reservoir information that you need in order to design a radioisotope tracer study for a field flood operation. Examples of reservoir information are shown below:

- Reservoir volume
- Reservoir thickness
- Porosity
- Injected volumes (liquids/gases)
- Oil/water saturation ratios

Project Design

Outline the design of the tracer application requested. Examples of items to consider are the following:

- Choice of radionuclides and method used to determine (1) the amount of radionuclide to be injected, and (2) the expected concentration of radionuclide in the fluids (gas, water, oil) at a recovery well site. Indicate your adherence to the ALARA principle
- How breakthrough time is predicted
- How tracer concentrations in the recovered liquids and gases are estimated
- How the sampling schedule at production wellheads is determined. Include a description of how you would determine when sampling could be discontinued. As an example, monitoring of samples may be ended when the design life of the project is completed, unless the effluent concentration at the control point is above a specified fraction of the maximum permissible concentration (as listed for unrestricted areas in **902 KAR 100, 'Kentucky Radiation Protection Regulations', Part 19, 'Standards for Protection Against Radiation'**) and is increasing. In that case, the control point will be monitored until the concentration is below the specified fraction of the annual average concentration specified in **902 KAR 100:019**.

Pre-injection Stage

Transportation of licensed materials.

State that the applicant will comply with KDPH and DOT regulations pertaining to the transportation of licensed material. Particular attention should be directed to monitoring requirements upon receipt of packages containing licensed materials.

Integrity of wellhead assembly and wellbore.

Describe the test procedures used to ensure that the wellhead assembly, including injection equipment, will not leak under operating conditions. Describe the procedures used to ensure that the wellbore will not leak underground. For example, if the injection well operates properly for a 2-week period, integrity of the wellbore may be considered ensured.

Injection Stage

Outline radiation safety practices during injection process. Following are examples of practices:

- Remain upwind, if practical.
- Keep nonessential personnel at a distance.
- Use personnel monitoring devices (TLD, OSL, film badges, finger badges, pocket dosimeters, etc.) and other radiation detection instruments in your monitoring and surveillance programs.
- Use special tools and devices to handle licensed material and to facilitate the injection process.
- Perform visual inspection, check pressure gauge, etc., to assure absence of leaks and proper delivery of injection liquid or gas.
- Continuously or intermittently monitor radiation levels outside the injection assembly to assure that the injection is proceeding according to the plan. Allow sufficient time before opening wellhead assembly.

Post-injection Stage

Outline radiation safety practices that will be put into place after the injection phase is completed. Examples of practices include the following:

- Check exposure rate at wellhead assembly for residual activity.
- Take smear samples to detect removable contamination on wellhead assembly.
- Clean reusable tools and check for residual activity before securing for reuse.
- Collect contaminated materials or contaminated tools and package them into an appropriate waste container.
- Establish schedule for taking samples for bioassay when, for example, handling tritium (H-3) exceeding 3.7 Gbq (0.1 Ci) or gaseous H-3 exceeding 3,700 Gbq (100 Ci), or handling radioiodine exceeding 1.85 Gbq (50 mCi) of Iodine-131 or Iodine-125.
- Provide instructions to well operator's personnel for taking post-injection samples and shipping the samples to your facilities for analysis. Include handling, packaging, and shipping procedures.
- Package waste materials for transportation, prepare appropriate labels and shipping papers, and check for radiation level and removable contamination outside the package.
- Measure concentrations of radionuclides in recovered liquids or gases, according to your established sampling schedule.
- Take corrective measures if the concentrations in the recovered liquids or gas approach or exceed design levels.
- Conduct area and personnel monitoring before leaving injection site.

Emergency Procedures

Outline procedures that you will follow in the event of incidents or accidents that release radioactive materials to the environment. Following are examples of incidents and accidents:

- Discovering a leaking source in a shipping container
- Dropping and breaking a source container, thereby spilling the source on the ground
- Detecting leakage of radioactive materials from wellhead assembly
- Measuring concentrations in liquids or gas from production wells exceeding limits specified in **10 CFR Part 20 Appendix B Table 2** of reference.

Reporting, Record Keeping, and Notification

Outline the report that will be submitted to the agency and the records maintained regarding the field flood injections. Following are examples of releases to include: records on the identification of wells, radionuclides, and quantities injected; concentrations of radionuclides in liquids or gases produced at production wells; and concentrations of radionuclides in products released from the field. Also outline the procedures you will follow in case of accidents; and procedures for notifying the proper persons or organizations, such as your company management (RSO), well operator or owner, and state, federal, or municipal governmental agencies involved with the control and oversight of affected wells.

Waste Management

The applicant should outline the procedures for disposing of licensed material. Wastes from tracer operations such as unused materials, and contaminated wipes, gloves, tools, clothing, containers, etc., should be disposed of in accordance with **902 KAR 100:019, 'Kentucky Radiation Protection Regulations', and 902 KAR 100:021**, Recovered waste fluids that contain radioactive tracers should either be re-injected or treated as radioactive waste. A commonly used method of disposal is transfer to a commercial firm licensed by KDPH, NRC, or another Agreement State to accept radioactive wastes. In dealing with these firms, prior contact is needed to determine the specific services they can provide. If commercial services will be used, this should be specified.

Appendix G

Typical Duties and Responsibilities of the Radiation Safety Officer

Typical Duties and Responsibilities of the Radiation Safety Officer

The RSO's duties and responsibilities include ensuring radiological safety and compliance with KDPH and US DOT regulations and the conditions of the license (see **Table 2**). Typically, these duties and responsibilities include ensuring the following:

- Secure from management the authorization to stop activities involving licensed material considered unsafe by the RSO.
- Maintain radiation exposures ALARA.
- Develop, distribute, implement, and maintain up-to-date operating and emergency procedures.
- Ensure that the possession, installation, relocation, use, storage, repair, and maintenance of licensed material and well logging equipment are consistent with the limitations in the license, the Sealed Source and Device Registration Certificate(s), and manufacturer's recommendations and instructions.
- Ensure that evaluations are performed to demonstrate that individuals who are not provided personnel monitoring devices will be unlikely to receive, in one year, a radiation dose in excess of 10% of the allowable limits or that personnel monitoring devices are provided.
- Ensure that personnel monitoring devices for well logging supervisors and assistants are used and exchanged at the proper intervals, and records of the results of such monitoring are maintained.
- Determine that licensed materials are maintained secure when not under the constant surveillance of logging personnel.
- Maintain documentation to demonstrate, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from licensed operations does not exceed the annual limit for members of the public.
- Ensure that proper authorities are notified of incidents such as fire, theft, or damage to sealed sources, loss of well logging sources downhole, and non-routine levels of radioactive contamination at well logging, tracer, and field study operations.
- Ensure that unusual occurrences are investigated, cause(s) and appropriate corrective action(s) are identified, and timely corrective action(s) are taken.
- Perform and document radiation safety program audits annually.
- Identify violations of regulations, license conditions, or program weaknesses, and develop, implement, and document corrective actions.
- Ensure that licensed material is transported in accordance with all applicable KDPH and US DOT requirements.
- Ensure that licensed material is disposed of properly.
- Keep license up-to-date by amending and renewing, as required. Ensure that renewals are made in a timely manner.
- Serve as the licensee's liaison officer with the agency on license or inspection matters.
- Control procurement and disposal of licensed material, maintain associated records, and ensure that licensed materials that are possessed or used by the applicant are limited to those specified in the license.
- Establish and conduct the training program for logging supervisors and logging assistants.
- Examine and determine the competence of logging personnel.
- Ensure that the licensed materials are used only by those individuals who have satisfactorily completed appropriate training programs or who are authorized by the license.
- Establish and maintain a personnel monitoring program and ensure that all users wear personnel monitoring equipment, such as film badges, OSL, or TLD.
- Establish and maintain storage facilities.
- Establish and maintain the leak test program and supervise leak testing of sealed sources.
- Procure and maintain radiation survey instruments.

- Establish and maintain a survey instrument calibration program.
- Develop and maintain up-to-date operating and emergency procedures.
- Conduct physical inventories and maintain utilization logs.
- Review and ensure maintenance of those records kept by others.
- Conduct radiation safety inspections of licensed activities periodically to ensure compliance with the regulations and license conditions.
- Serve as a point of contact and give assistance in case of emergency (well logging tool damage, theft, fire, etc.) to ensure that the proper authorities are notified.
- Investigate the cause of incidents and determine necessary preventative action.
- Act in an advisory capacity to the licensee's management and logging personnel.
- Establish a procedure for evaluating and reporting equipment defects and noncompliance pursuant to **902 KAR 100:040** and **10 CFR Part 21**.

Appendix H

Suggested Well Logging and Field Flood Audit Checklist

Suggested Well Logging and Field Flood Audit Checklist

All areas indicated in audit notes may not be applicable to every license and may not need to be addressed during each audit. For example, licensees do not need to address areas that do not apply to the licensee's activities, and activities that have not occurred since the last audit need not be reviewed at the next audit.

Date of This Audit _____

Date of Last Audit _____

Next Audit Date _____

Auditor Date (Signature) _____

Date: _____

Management Review Date (Signature) _____

Date: _____

Type of Inspection: () Announced () Unannounced

Summary of Findings and Actions

- No violations cited
- Self-identified Violation(s)
- Concerns

A. ORGANIZATION AND SCOPE OF PROGRAM

Organization and scope of radiation safety program in accordance with application and the license.

B. MANAGEMENT OVERSIGHT

1. Radiation Safety Officer

2. Audits, Reviews, or Inspections

902 KAR 100:019

Radiation protection programs.

902 KAR 100:019

Records of radiation protection programs.

Audits required by license conditions.

3. Use by Authorized Individuals.

Management structure and control as specified in the license.

4. ALARA

902 KAR 100:019

Radiation protection program.

C. FACILITIES

1. Facilities as Described.

Facilities as described in the license.

2. Storage

902 KAR 100:019

Security and control of licensed or registered sources of radiation.

902 KAR 100:019

Storage precautions.

902 KAR 100:019, 142

Transport precautions.

902 KAR 100:019

Labeling.

D. EQUIPMENT AND INSTRUMENTATION

1. Instruments and Equipment

902 KAR 100:019, 142 Radiation survey instruments.
Radiation detection instruments and equipment as described in the license.

2. Sources, Source Holders, Tools

902 KAR 100:142 Storage precautions.
902 KAR 100:142 Transport precautions.
902 KAR 100:142 Labeling.
Equipment and instrumentation as specified in the license.

E. MATERIAL USE, CONTROL, AND TRANSFER

1. Security and Control

902 KAR 100:142; 010 Definitions (restricted area and unrestricted area).
902 KAR 100:142 Security and control of licensed or registered sources of radiation.
902 KAR 100:142 Security.

2. Receipt and Transfer of Licensed Material

902 KAR 100:019 Compliance with dose limits for individual members of the public.
902 KAR 100:019, 142 Procedures for receiving and opening packages.
902 KAR 100:019 General.
902 KAR 100:019 Records of surveys.
902 KAR 100:040 Transfer of material.
902 KAR 100:019, 040 Records.
902 KAR 100:040 Receipt, transfer and disposal records.

3. Isotope, Chemical Form, Quantity, and Use

902 KAR 100:142 Physical inventory.
902 KAR 100:142 Radioactive markers.
Receipt and transfer as described in the license.

F. INSPECTION AND MAINTENANCE

902 KAR 100:142 Inspection and maintenance.
902 KAR 100: 040, 10 CFR 21.21 Notification of failure to comply or existence of a defect and its evaluation.
Inspection and maintenance as described in the license.

G. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

1. Area Surveys

902 KAR 100:019 Compliance with dose limits for individual members of the public.
902 KAR 100 General.
902 KAR 100:142, 019 Records of surveys.
902 KAR 100:019 Records of dose to individual members of the public.
902 KAR 100:142 Radiation surveys and contamination control.
Area radiation surveys and contamination control as described in the license.

2. Leak Tests and Inventories

902 KAR 100:060, 142 Leak testing of sealed sources.
Leak test conducted in accordance with applicable license conditions.

- 3. Tracer Studies
 - 902 KAR 100:142 Subsurface tracer studies.
 - 902 KAR 100:142 Design, performance, and certification criteria for sealed sources used in downhole operations

H. TRAINING AND INSTRUCTIONS TO WORKERS

- General
 - 902 KAR 100:165 Instruction to workers.
 - 902 KAR 100:142 Training requirements.
 - Knowledge of 902 KAR 100, ‘Kentucky Radiation Protection Regulations’, Part 142, ‘Wire Line Service Operations’ radiation protection procedures and requirements.
 - Training program for personnel in accordance with the license.

I. RADIATION PROTECTION

- 1. Radiation Protection Program
 - a. Exposure evaluation
 - 902 KAR 100:019 General.
 - b. Programs
 - 902 KAR 100:019 Radiation protection programs.

- 2. Dosimetry
 - a. Dose Limits
 - 902 KAR 100:019 Occupational dose limits for adults.
 - 902 KAR 100:019 Compliance with requirements for summation of external and internal doses.
 - 902 KAR 100:019 Occupational dose limits for minors.
 - 902 KAR 100:019 Doses to an embryo/fetus.
 - b. External
 - 902 KAR 100:019 Personnel Monitoring.
 - 902 KAR 100:019 Determination of external dose from airborne radioactive material.
 - 902 KAR 100:015 General.
 - 902 KAR 100:019 Conditions requiring individual monitoring of external and internal occupational dose.
 - Dosimetry provided in accordance with the license.
 - c. Internal
 - 902 KAR 100:019 Personnel Monitoring
 - 902 KAR 100:019 Determination of internal exposure.
 - 902 KAR 100:019 Conditions requiring individual monitoring of external and internal occupational dose.
 - 902 KAR 100:019 Use of process or other engineering controls.
 - 902 KAR 100:019 Use of other controls.
 - 902 KAR 100:019 Use of respiratory protection equipment.

- 3. Records
 - 902 KAR 100:019 Records of radiation protection programs.
 - 902 KAR 100:019 Records of surveys.
 - 902 KAR 100:019 Determination of prior occupational dose.
 - 902 KAR 100:019 Records of individual monitoring results.

J. RADIOACTIVE WASTE MANAGEMENT

1. Disposal
 - 902 KAR 100:040** Transfer of byproduct material.
 - 902 KAR 100:019** Labeling containers and radiation machines.
 - 902 KAR 100:015** General requirements.
 - 902 KAR 100:** Records of surveys.
 - 902 KAR 100** Records of waste disposal.
 - 902 KAR 100** Disposal by release into sanitary sewerage.
2. Effluents
 - a. General

Maintaining effluents from facilities/job sites As Low as Is Reasonably Achievable (ALARA).
 - b. Release to septic tanks
 - 902 KAR 100:010** Definitions (sanitary sewerage).
 - 902 KAR 100:019** Annual Limits on Intake (ALI) and Derived Air Concentrations (DACs) of radionuclides for occupational exposure; effluent concentrations; concentrations.
 - c. Incineration of waste
 - 902 KAR 100:021** Treatment or disposal by incineration.
 - d. Control of air effluents and ashes
 - 902 KAR 100:019** Occupational dose limits for adults.
 - 902 KAR 100:019** Dose limits for individual members of the public.
 - 902 KAR 100:019** General.
 - 902 KAR 100:019** Use of process or other engineering controls.

Incineration conducted in accordance with license condition.
3. Waste Management
 - a. General
 - 902 KAR 100:021** General requirements.

Radioactive Waste Management - Inspection of Waste Generator Requirements of **902 KAR 100**, ‘**Kentucky Radiation Protection Regulations**’, **Part 21 and 22**
 - b. Waste compacted

Applicable license conditions.
 - c. Waste storage areas
 - 902 KAR 100:019** Security and control of licensed or registered sources of radiation.
 - 902 KAR 100:165** Posting requirements.
 - 902 KAR 100:019** Labeling containers and radiation machines.

Waste storage areas in accordance with the license.
 - d. Packaging, Control, and Tracking
 - 902 KAR 100:022** Requirements for transfers of low-level radioactive waste intended for disposal at land disposal facilities and manifests.
 - 902 KAR 100:021** Transfer for Disposal and Manifests.
 - 902 KAR 100:021** Waste classification.
 - 902 KAR 100:021** Waste characteristics.
 - e. Transfer
 - 902 KAR 100:021** Requirements for transfers of low-level radioactive waste intended for disposal at land disposal facilities and manifests.
 - 902 KAR 100:021** General requirements.
 - 902 KAR 100:021** Transfer for disposal and manifests.
 - f. Records
 - 902 KAR 100:019** Records of surveys.
 - 902 KAR 100:021** Records of waste disposal.

K. DECOMMISSIONING

902 KAR 100:042

Expiration and termination of licenses and decommissioning of sites and separate buildings or outdoor areas.

902 KAR 100:040

Radiological criteria for license termination.

L. TRANSPORTATION

1. General

Hazard Communication for Class 7 (Radioactive) Materials.

902 KAR 100:070

Transportation of licensed material.

Implementation of Revised **49 CFR Parts 100-177** and **902 KAR 100:070**, 'Transportation of Radioactive Materials'

2. Shippers - Requirements for Shipments and Packaging

a. General Requirements

49 CFR Part 173, Subpart I

Class 7 (radioactive) materials.

49 CFR 173.24

General requirements for packaging and packages.

49 CFR 173.448

General transportation requirements.

49 CFR 173.435

Table of A₁ and A₂ values for radionuclides.

b. Transport Quantities

902 KAR 100:010

Definitions.

i. All quantities

902 KAR 100:010

Definitions.

49 CFR 173.410

General design requirements.

49 CFR 173.441

Radiation level limitations.

49 CFR 173.443

Contamination control.

49 CFR 173.475

Quality control requirements prior to each shipment of of Class 7 (radioactive) materials.

49 CFR 173.476

Approval of special form Class 7 (radioactive) materials.

ii. Limited quantities

49 CFR 173.421

Excepted packages for limited quantities of Class 7 (radioactive) materials.

49 CFR 173.422

Additional requirements for excepted packages containing Class 7 (radioactive) materials.

iii. Type A quantities

49 CFR 173.412

Additional design requirements for Type A packages.

49 CFR 173.415

Authorized Type A packages.

49 CFR 178.350

Specification 7A; general packaging, Type A.

iv. Type B quantities

v. LSA material and SCO

49 CFR 173.403

Definitions.

49 CFR 173.427

Transport requirements for low specific activity (LSA) Class 7 (radioactive) materials and surface contaminated objects (SCO).

c. HAZMAT Communication Requirements

49 CFR 172.200-205

Shipping papers.

49 CFR 172.300-338

Marking.

49 CFR 172.400-450

Labeling.

49 CFR 172.500-560

Placarding.

49 CFR 172.600-604

Emergency response information.

3. HAZMAT Training

49 CFR 172.702

Applicability and responsibility for training and testing.

49 CFR 172.704

Training requirements.

- 4. Transportation by Public Highway
 - 49 CFR 171.15** Immediate notice of certain hazardous materials incidents.
 - 49 CFR 171.16** Detailed hazardous materials incident reports.
 - 49 CFR 177.800** Purpose and scope of this part and responsibility for compliance and training.
 - 49 CFR 177.816** Driver training.
 - 49 CFR 177.842** Loading and unloading: Class 7 (radioactive) material.

M. NOTIFICATIONS AND REPORTS

- 902 KAR 100:165** Notifications and reports to individuals.
- 902 KAR 100:019** Reports of stolen, loss, or missing licensed or registered sources of radiation.
- 902 KAR 100:019** Notification of incidents.
- 902 KAR 100:040** Reporting requirements.

N. POSTING AND LABELING

- 902 KAR 100:165** Posting of notices to workers.
- 902 KAR 100:19** Posting requirements.
- 902 KAR 100:19** Exceptions to posting requirements.
- 902 KAR 100:19** Labeling containers and radiation machines.
- 902 KAR 100:19** Exemptions to labeling requirements.

O. FIELD STATIONS AND TEMPORARY JOB SITES

- 1. Documents and Records at Field Stations
 - 902 KAR 100:142** Documents and records required at field stations.
 - Records at field stations as required by license conditions.
- 2. **902 KAR 100:142** Documents and records required at temporary job sites.
 - Records at temporary job sites as required by license conditions.

P. ABANDONMENT OF SOURCES

- 902 KAR 100:142** Agreement with well owner or operator.
- 902 KAR 100:142** Notification of incidents, abandonment, and lost sources.

Q. INDEPENDENT AND CONFIRMATORY MEASUREMENTS

R. PERSONNEL CONTACTED

Name, Title, Date of Contact

Appendix I

Guidance on Decommissioning Funding Plan and Financial Assurance

Guidance on Decommissioning Funding Plan and Financial Assurance

Determining Need for a Decommissioning Funding Plan and Financial Assurance

Table 8 and the worksheet in **Table 9** are used to determine the need for certification of financial assurance (F/A) for decommissioning or a decommissioning funding plan (DFP), as required by **902 KAR 100:042**.

Table 8 is a listing of isotopes with a half-life of greater than or equal to 120 days used in well logging and tracer operations. If the applicant proposes to use isotopes with a half-life greater than or equal to 120 days, divide the requested possession limit (in millicuries for unsealed material and curies for sealed sources) of the isotope by the value for that isotope in **Table 8**. If the material requested is in an unsealed form, use the value in the unsealed column. If the material requested is in a sealed form, use the value in the sealed column. Place the fraction in the proper column in **Table 9**. Add the fractions in the column and place the total in the row labeled total (i.e., ‘sum of the ratios’).

Table 8. Isotopes With Half-lives Greater Than or Equal to 120 Days

Isotope	Quantity in Millicuries Requiring \$225,000 Financial Assurance	Quantity in Millicuries Requiring \$1,125,000 Financial Assurance	Quantity in Curies Requiring That a Decommissioning Funding Plan Be Submitted
Unsealed Licensed Material			
Calcium-45	10	100	1000
Carbon-14	100	1000	10000
Hydrogen-3	1000	10000	100000
Krypton-85	100	1000	10000
Nickel-63	10	100	1000
Silver-110m	1	10	100
Any alpha-emitting radionuclide not listed above with a half-life greater than or equal to 120 days.			
Sealed Sources			
Isotope			Quantity in Curies Requiring \$113,000 of Financial Assurance
Americium-241			100
Cesium-137			100000
Cobalt-60			10000
Hydrogen-3			10000000

Note: 1 Curie = 37 gigabecquerels

Table 9. Sample Worksheet for Determining Need for a Decommissioning Funding Plan or Financial Assurance

Isotope	Unsealed Material Activity (Millicuries) ÷ Unsealed Value from Table 8	Sealed Material Activity (Curies) ÷ Sealed Value from Table 8
Total		
Funds required		
	If < 1.0, enter \$0 If > 1.0 but < 10.0, enter first level of financial assurance specified in 902 KAR 100:042 If > 10.0, but < 100.0, enter second level of financial assurance specified in 902 KAR 100:042 If > 100.0, enter “DFP only”	If < 1.0, enter \$0 If > 1.0, enter sealed source financial assurance specified in 902 KAR 100:042

If the sum of the fractions is less than 1 for each category (unsealed and sealed), the applicant does not need to submit certification of F/A or a DFP. If the sum of the fractions is greater than 1 for either category (sealed or unsealed), but less than 100, the applicant will need to submit certification of F/A (in the level I or in the level II amount specified in **902 KAR 100:042**) or a DFP. If the sum of the fractions is greater than 100 for unsealed material, the applicant must submit a DFP.

Reference: “Criteria Relating to Use of Financial Tests and Parent Company Guarantees for Providing Reasonable Assurance of Funds for Decommissioning” can be found in **10 CFR 30**, Appendix A. “Criteria Relating to Use of Financial Tests and Self Guarantees for Providing Reasonable Assurance of Funds for Decommissioning” can be found in **10 CFR 30**, Appendix C. NRC Regulatory Guide 3.66, “Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72”, dated June 1990, provides sample documents for financial mechanisms.

Appendix J

NRC Letter Dated August 10, 1989, Transmitting Temporary Generic Exemptions to Well Logging Licensees

NRC Letter Dated August 10, 1989, Transmitting Temporary Generic Exemptions to Well Logging Licensees

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

AUG 10 1989

TO: Well Logging Licensees

FROM: John E. Glenn, Chief Medical, Academic, and Commercial Use Safety Branch
Division of Industrial and Medical Nuclear Safety, NMSS

SUBJECT: **10 CFR PART 39.41(A)(3)** TEMPORARY GENERIC EXEMPTION

Attached (Enclosure 1) is a notice of generic exemption that exempts Nuclear Regulatory Commission (NRC) well logging licensees from the requirement to use only sealed sources that meet the prototype testing requirements specified in paragraph 39.41(a)(3) of 10 CFR Part 39 in well logging operations. The exemption applies only to sealed sources that meet certain alternate prototype testing criteria.

Section 39.41 of 10 CFR Part 39 prohibits licensees from using, after July 14, 1989, a sealed source in well logging unless the source is doubly encapsulated; contains licensed material whose chemical and physical forms are as insoluble and non-dispersible as practical; and is prototype performance tested and found to maintain its integrity after each of the following tests: temperature, impact, vibration, puncture, and pressure. These prototype performance tests are the same as the tests specified for well logging sources in American National Standard Institute (ANSI) N542-1977, "*Sealed Radioactive Sources, Classification*", published by the National Bureau of Standards (NBS Handbook 126) in 1978. The notice also provides that NRC intends, through rulemaking, to reevaluate the requirements in Section 39.41(a)(3) for prototype testing of sealed sources. The generic exemption will allow continued use of sealed sources that were prototype tested in accordance with an earlier national standard [United States of America Standards Institute (USASI) N5.10-1968] while NRC reevaluates these requirements.

Also attached are three enclosures that list various sealed source models common to well logging and identifies their suitability for continued use in well logging operations. Enclosure 2 lists those source models which appear to meet Section 39.41 requirements and are approved for continued use. Enclosure 3 identifies those source models whose continued use is authorized under the temporary generic exemption. Enclosure 4 lists those source models that do not meet the requirements of Section 39.41 or the generic exemption and whose use in well logging must be discontinued upon receipt of this letter. When a sealed source is contained (and normally stored) within a device (logging tool), the sealed source manufacturer and model number is shown below the entry. When NRC has been able to determine that a sealed source model was manufactured/distributed by another company, or more than one model designation may have been used, this information is shown in parentheses below the entry. Neutron generators are shown by the designation "Nu GEN." An asterisk(*) indicates that the source is used within the logging tool's electronics package.

These lists may not be all inclusive; therefore, if you are authorized to use a sealed source model that is not identified on one of the lists, you should contact the individual noted below so that NRC can determine the status of the source. Upon receipt of this letter, the use of any source not listed on either Enclosure 2 or 3 must be discontinued until its suitability for continued use is determined.

Because many manufacturers are located in Agreement States, NRC relied on information from its Sealed Source and Device Registry to determine a source model suitability for continued use. The Registry only summarizes the more detailed information the manufacture/distributor provides to NRC or an Agreement State when registering its sources. If you have information that shows that a source model listed on Enclosure 4 meets the requirements of Section 39.41 or the generic exemption, you may provide this information to NRC and request that the source's status be reconsidered. Alternatively, NRC will reconsider a source's status if such sources are tested and certified by a qualified testing organization as meeting Section 34.91, 10 CFR Part 39 criteria.

If you have any questions about Section 39.41, 10 CFR Part 39 regulatory requirements, the generic exemption, or the suitability of a sealed source for continued use in well logging, you should contact Bruce Carrico at (301)492-0634.

John E. Glenn, Chief
Medical, Academic, and Commercial Use Safety Branch
Division of Industrial and Medical Nuclear Safety, NMSS

Enclosures: As stated

WELL LOGGING SEALED SOURCES APPROVED UNDER PART 39 REQUIREMENTS

<u>MANUFACTURER</u>	<u>MODEL</u>
AMERSHAM CORPORATION	AMN.CYn (n = 1 to 14)
AMERSHAM CORPORATION	AMN.CY1
AMERSHAM CORPORATION	AMN.PEn (n = 1 to 4)
AMERSHAM CORPORATION	CDC.CYn (n = 2 to 12)
AMERSHAM CORPORATION	CKC.CDn (n = 2 to 12)
AMERSHAM CORPORATION	CKC.800 SERIES
AMERSHAM CORPORATION	CVN.CDn (n = 2 to 12)
AMERSHAM CORPORATION (GAMMA INDUSTRIES, GENERAL NUCLEAR)	VD (HP)
ANADRILL, INC* ISOTOPE PRODUCTS MODEL 174 SEALED SOURCE	SGS-AA, SGS-BA, OR SGS-CA
COMPROBE, INC. GAMMA INDUSTRIES MODEL VD-HP SEALED SOURCE GULF NUCLEAR, INC. MODEL VL-1 SEALED SOURCE	1203 DENSITY PROBE
DRESSER INDUSTRIES INC. (Nu GEN)	C-58301, C-107298
E.I.DUPONT DE NUMOURS & CO. (NEW ENGLAND NUCLEAR)	NER-571
GEARHART INDUSTRIES, INC. (Nu GEN)	013-1004-000
GENERAL ELECTRIC. CO.	GE(N)-Cf-100 SERIES
GULF NUCLEAR, INC. (NEEI)	VL-1
GULF NUCLEAR, INC. (NEEI)	71-1 (NEEI-AMBE-71-1)
KAMAN SCIENCES CORPORATION (Nu GEN)	A-3061
KAMAN SCIENCES CORPORATION (Nu GEN)	A-320
KAMAN SCIENCES CORPORATION (Nu GEN)	A-520

<u>MANUFACTURER</u>	<u>MODEL</u>
KAMAN SCIENCES CORPORATION (Nu GEN)	E-3010 AND E-3020
MONSANTO CO., DAYTON LABORATORY	H-245258 (NSR-M)
MONSANTO CO., DAYTON LABORATORY	24113
MONSANTO CO., DAYTON LABORATORY	24154-C
MONSANTO CO., DAYTON LABORATORY	24174
MONSANTO CO., DAYTON LABORATORY	24181
MONSANTO CO., DAYTON LABORATORY	24183
P.A. INCORPORATED (MONSANTO)	H-245258 (NSR-M)
P.A. INCORPORATED*	P-194693
UNC NUCLEAR INDUSTRIES	PA2A, PA2B, PT2A, PT2B, PS2A, PS2B (OLD: SM-100)
E.I. DUPONT DE NUMOURS & CO. (NEN) MODEL 478C SEALED SOURCE	
US DEPARTMENT OF ENERGY	SR-CF-100 SERIES

WELL LOGGING SEALED SOURCES APPROVED UNDER THE GENERIC EXEMPTION

<u>MANUFACTURER</u>	<u>MODEL</u>
COMPROBE, INC. GULF NUCLEAR, INC. MODEL CSV SEALED SOURCE	1203 DENSITY PROBE
COMPROBE, INC. GAMMA INDUSTRIES (GAMMATRON) MODEL AN- HP SEALED SOURCE	2103 DENSITY PROBE
E.I.DUPONT DE NUMOURS & CO. (NEW ENGLAND NUCLEAR)	NER-572, NER-582
GAMMA INDUSTRIES (GENERAL NUCLEAR, INC.)	CS-1000 (HP)
GAMMA INDUSTRIES (GENERAL NUCLEAR, INC.)	GNI-NB (HP)
GAMMA INDUSTRIES	NB (HP)
GAMMA INDUSTRIES (GENERAL NUCLEAR, INC.)	NHP-A-#
GAMMA INDUSTRIES	WLG-1
GAMMATRON, INC. (NUCLEAR SOURCES AND SERVICES, INC.)	AN-HP
GAMMATRON, INC. (NUCLEAR SOURCES AND SERVICES, INC.)	AN-HPG, RN-HP
GAMMATRON, INC. (NUCLEAR SOURCES AND SERVICES, INC.)	DA-20
GAMMATRON, INC. (NUCLEAR SOURCES AND SERVICES, INC.)	DA-5
GAMMATRON, INC. (NUCLEAR SOURCES AND SERVICES, INC.)	GT-GHP
GULF NUCLEAR, INC. (NEEI)	AMBE-71-2A
GULF NUCLEAR, INC. (NEEI)	0-73-2
GULF NUCLEAR, INC. (NEEI)	CS-2

MANUFACTURER**MODEL**GULF NUCLEAR, INC.
(NEEI)

CSV

MONSANTO CO., DAYTON LABORATORY

24112

MONSANTO CO., DAYTON LABORATORY

24120

PARKWELL LABORATORIES, INC.

PL-104

KNOWN SEALED SOURCES NOT APPROVED FOR USE IN WELL LOGGING**MANUFACTURER****MODEL**

AMERSHAM CORPORATION

CD CQ 5987

AMERSHAM CORPORATION

CDC.800 SERIES
(.801 TO .811)

DRESSER ATLAS

B89596, B89587, B89598

FRONTIER TECHNOLOGY CORP.

100

GAMMA INDUSTRIES
(GENERAL NUCLEAR, INC.)

GNI-DL-4

GAMMA INDUSTRIES
(GENERAL NUCLEAR, INC.)

GNI-NB-S-5. 0

GAMMA INDUSTRIES

NB-S-S, NB-S-20

GAMMA INDUSTRIES
(GENERAL NUCLEAR, INC.)

PL-AMBE-2.7

GAMMA INDUSTRIES

RC-1 (HP)

GAMMA INDUSTRIES

S-14

GAMMATRON, INC.
(NUCLEAR SOURCES AND SERVICES, INC.)

GT-G

GENERAL NUCLEAR, INC.

GNI-C(G)M-5

GULF NUCLEAR, INC.
(NEEI)

CO-50

GULF NUCLEAR, INC.
(NEEI)

CS-50

GULF NUCLEAR, INC. (NEEI)	TG-1	
GULF NUCLEAR, INC. (NEEI)	72-CO-200	
HASTINGS RADIOCHEMICAL WORKS	CS-III-A-100	
ICN PHARMACEUTICAL, INC. (US NUCLEAR)	373	
ICN PHARMACEUTICAL, INC. (US NUCLEAR)	374	
		<u>MODEL</u>
<u>MANUFACTURER</u>	376	
ICN PHARMACEUTICAL, INC. (US NUCLEAR)		
ICN PHARMACEUTICAL, INC. (US NUCLEAR)	3146	
ISOTOPES SPECIALTIES	0-0037	
LFE CORPORATION (TRACERLAB)	CS-15	
MINNESOTA MINING AND MANUFACTURING	4F6B	
MINNESOTA MINING AND MANUFACTURING (REDESIGN OF MODEL 4F68)	4F6H	
MINNESOTA MINING AND MANUFACTURING	4F6S	
MINNESOTA MINING AND MANUFACTURING	4P6F	
MINNESOTA MINING AND MANUFACTURING	4P6U	
MINNESOTA MINING AND MANUFACTURING	4P6W	
MONSANTO CO., DAYTON LABORATORY (SCHLUMBERGER WELL SERVICES)	H-142525	
MONSANTO CO., DAYTON LABORATORY (SCHLUMBERGER WELL SERVICES)	H-207947	
MONSANTO CO., DAYTON LABORATORY	MRC	
MONSANTO CO., DAYTON LABORATORY	MRC-N-SS-W-AMBE(R)	
MONSANTO CO., DAYTON LABORATORY	NS-WELEX	

Appendix K

Well Logging Supervisor and Logging Assistant Training Requirements

Well Logging Supervisor and Logging Assistant Training Requirements

Table 10

	Requirement	Training Criteria
	902 KAR 100:142	Logging Supervisor
A.	Receive Training in 902 KAR 100:142 Topics (Classroom Training – Approximately 24 hours in length)	Topics in 902 KAR 100:142 Fundamentals of Radiation Safety <ul style="list-style-type: none"> • Characteristics of gamma radiation • Units of radiation dose and quantity of radioactivity • Hazards of exposure to radiation • Levels of radiation from licensed material • Methods of controlling radiation dose (time, distance, shielding) • Radiation safety practices, including prevention of contamination, and methods of decontamination Radiation Detection Instruments <ul style="list-style-type: none"> • Use, operation, calibration, and limitations • Survey techniques • Use of personnel monitoring equipment Equipment to be Used <ul style="list-style-type: none"> • Operation of equipment, including source handling equipment and remote handling tools • Storage, control, and disposal of licensed material • Inspection and maintenance of equipment Requirements of Pertinent State and Federal Regulations Case histories of accidents in well logging operations

Table 10. 902 KAR 100: 142 Training Requirements

Requirement 902 KAR 100:142		Training Criteria Logging Supervisor
B.	On-the-Job Training – using sealed sources 160 hours for mineral logging licensee, or a licensee using sealed sources with activities less than 500 millicuries OR 3 months or 520 hours for gas or oil well logging operations using sealed sources with activities greater than 500 millicuries	Under the supervision of a qualified logging supervisor
C.	On-the-Job Training – using tracer materials Single Well Tracer Operations 3 months or 520 hours or completion of 50 tracer operations Field Flood Operations 3 months or 520 hours or completion of 3 field flood tracer operations involving multiple wells	Under the supervision of a qualified logging supervisor
D.	Completion of a Written Examination	Complete a written examination submitted and approved by KDPH
E.	Must receive Copies of and Instruction in: (Classroom Training – Approximately 8 hours in length)	KDPH Regulations <ul style="list-style-type: none"> • Applicable sections of 902 KAR 100:040, 902 KAR 100:142 • The KDPH license under which the logging supervisor will perform well logging • The operating and emergency procedures required by 902 KAR 100:142
F.	Receive Equipment Training (Approximately 4 hours in length)	Training includes: <ul style="list-style-type: none"> • Well Logging Equipment • Sealed Sources • Handling Equipment • Survey meters • Daily inspection
G.	Demonstrate Understanding in Use of Well Logging Equipment by Passing Practical Field Exam	Questions on topics determined by the licensee Use the Well Logging Supervisor/Logging Assistant Inspection Checklist as a potential source of questions

Table 10. 902 KAR 100:142 Training Requirements

Requirement 902 KAR 100:142		Training Criteria Logging Supervisor
I.	Annual Refresher Training	Review the following: <ul style="list-style-type: none"> • Annual radiation safety program review • New procedures, equipment, or techniques • New regulations • Observations and deficiencies during audits of well logging supervisor and logging assistants and discussion of any significant incidents or accidents involving well logging • Employee questions
J.	Records	To be maintained in accordance with 902 KAR 100:040

Requirement 902 KAR 100:142		Training Criteria Logging Assistant
A.	Must receive Copies of and Instruction in: (Classroom Training – Approximately 8 hours in length)	KDPH Regulations <ul style="list-style-type: none"> • Applicable sections of 902 KAR 100:019, • Operating and emergency procedures required by 902 KAR 100:040 and 902 KAR 100:142
B.	Pass Oral or Written Exam	Complete a written examination submitted and approved by KDPH
C.	Receive Equipment Training (Approximately 2-4 hours in length)	Training under the supervision of a qualified well logging supervisor appropriate for the logging assistant's intended job responsibilities: <ul style="list-style-type: none"> • Well logging equipment • Sealed sources • Handling equipment • Survey meters • Daily inspection
D.	Annual Refresher Training	Review the following: <ul style="list-style-type: none"> • Any significant item identified in the annual review of the radiation safety program • New procedures or equipment • New regulations • Observations and deficiencies during audits and discussion of any significant incidents or accidents involving well logging operations • Employee questions
E.	Records	To be maintained in accordance with 902 KAR 100

Table 10. 902 KAR 100:142 Training Requirements

Appendix L

Annual Internal Job Performance Inspection Checklist for Well Logging Supervisors and Well Logging Assistants

Annual Internal Job Performance Inspection Checklist for Well Logging Supervisors and Well Logging Assistants

Well Logging Location _____

Date _____ Time _____

Logging Supervisor _____

Logging Assistant _____

Inspector _____

Yes/No Questions

1. Film, TLD, or OSL badge available and properly worn?
2. Individuals working within the restricted area wearing TLD, OSL, or film badges or dosimeters?
3. Restricted areas properly controlled to prevent unauthorized entry?
4. Calibrated and properly operating survey meter and evidence of its latest calibration available?
5. Latest survey records as required by **902 KAR 100:019** or **902 KAR 100:142** available?
6. Measurements taken of positions occupied in transport vehicle?
7. Measurement taken of vehicle exterior?
8. Contamination check performed of well logging tool prior to transport?
9. Measurements taken before and after subsurface tracer use?
10. Shipping papers for transportation of radioactive material available and properly filled out?
11. Utilization log properly filled out?
12. Defective well logging equipment being used?
13. Copy of the applicant's operating and emergency procedures available at the site?
14. Radioactive isotopes stored and secured properly to prevent unauthorized removal?
15. Storage area properly posted with "*Caution...*" or "*Danger Radioactive Material*" signs?
16. Additional items of noncompliance noted during this audit? (If any, explain, in remarks.)

Remarks:

Appendix M

Radiation Monitoring Instrument Specifications and Model Survey Instrument Calibration Program

Radiation Monitoring Instrument Specifications and Model Survey Instrument Calibration Program

Radiation Monitoring Instrument Specifications

The specifications in **Table 11** will help applicants and licensees choose the proper radiation detection equipment for monitoring the radiological conditions at their facilities.

Table 11

Portable Instruments Used for Contamination and Ambient Radiation Surveys			
Detectors	Radiation	Energy Range	Efficiency
Exposure Rate Meters	Gamma, X-Ray	μ R-R	N/A
Count Rate Meters			
GM	Alpha	All energies (dependent on window thickness)	Moderate
	Beta	All energies (dependent on window thickness)	Moderate
NaI Scintillator	Gamma	All energies	< 1%
	Gamma	All energies (dependent on crystal thickness)	Moderate
Plastic Scintillator	Beta	Carbon-14 or higher (dependent on window thickness)	Moderate
Stationary Instruments Used to Measure Wipe, Bioassay, and Samples from Tracer/Field Flood Study Job Sites			
Detectors	Radiation	Energy Range	Efficiency
Liquid Scintillation Counter*	Alpha	All energies	High
	Beta	All energies	High
	Gamma		Moderate
Gamma Spectroscopy System using a (NaI)* detector	Gamma	All energies	High
Gas Proportional	Alpha	All energies	High
	Beta	All energies	Moderate
	Gamma	All energies	< 1%

Table 11 Typical Survey Instrumentation.

Note: Table adapted from The Health Physics & Radiological Health Handbook, Revised Edition, Edited by Bernard Shleien, 1992 (except for * items).

Model Instrument Calibration Program

Training

Before allowing an individual to perform survey instrument calibrations, the RSO will ensure that he or she has sufficient training and experience to perform independent survey instrument calibrations. Classroom training may be in the form of lecture, videotape, or self-study and will cover the following subject areas:

- Principles and practices of radiation protection
- Radioactivity measurements, monitoring techniques, and using instruments
- Mathematics and calculations basic to using and measuring radioactivity
- Biological effects of radiation.

Appropriate on-the-job training consists of the following:

- Observing authorized personnel performing survey instrument calibration
- Conducting survey meter calibrations under the supervision and in the physical presence of an individual authorized to perform calibrations.

Facilities and Equipment for Calibration of Dose Rate or Exposure Rate Instruments

- To reduce doses received by individuals not calibrating instruments, calibrations will be conducted in an isolated area of the facility or at times when no one else is present
- Individuals conducting calibrations will wear assigned dosimetry
- Individuals conducting calibrations will use a calibrated and operable survey instrument to ensure that unexpected changes in exposure rates are identified and corrected

Model Procedure for Calibrating Survey Instruments

A radioactive sealed source(s) used for calibrating survey instruments will:

- Approximate a point source
- Have its apparent source activity or the exposure rate at a given distance traceable by documented measurements to a standard certified to be within $\pm 5\%$ accuracy by National Institutes of Standards and Technology (NIST)
- Approximate the same energy and type of radiation as the environment in which the calibrated device will be employed or develop energy curves to compensate for differing energies
- For dose rate and exposure rate instruments, the source should be strong enough to give an exposure rate of at least about 7.7×10^{-6} coulombs/kilogram/hour (30 mR/hr) at 100 cm [e.g., 3.1 gigabecquerels (85 mCi) of cesium-137 or 7.8×10^2 megabecquerels (21 mCi) of cobalt-60]

The three kinds of scales frequently used on dose or dose rate survey meters are calibrated as follows:

- Linear readout instruments with a single calibration control for all scales should be adjusted at the point recommended by the manufacturer or at a point within the normal range of use. Instruments with calibration controls for each scale should be adjusted on each scale. After adjustment, the response of the instrument should be checked at approximately 20% and 80% of full scale. The instrument's readings should be within $\pm 15\%$ of the conventionally true values for the lower point and $\pm 10\%$ for the upper point.
- Logarithmic readout instruments, which commonly have a single readout scale spanning several decades, normally have two or more adjustments. The instrument should be adjusted for each scale according to site specifications or the manufacturer's specifications. After adjustment, calibration should be checked at a minimum of one point on each decade. Instrument readings should have a maximum deviation from the conventionally true value of no more than 10% of the full decade value.
- Meters with a digital display device shall be calibrated the same as meters with a linear scale

- Readings above 2.58×10^{-4} coulomb/kilogram/hour (1 R/hr) need not be calibrated, but such scales should be checked for operation and response to radiation
- The inverse square and radioactive decay laws should be used to correct changes in exposure rate due to changes in distance or source decay.

Surface Contamination Measurement Instruments

- A survey meter's efficiency must be determined by using sealed sources with similar energies and types of radiation that the survey instrument will be used to measure or by developing energy curves to compensate for differing energies.
- If each scale has a calibration potentiometer, the reading should be adjusted to read the conventionally true value at approximately 80% of full scale, and the reading at approximately 20% of full scale should be observed. If only one calibration potentiometer is available, the reading should be adjusted at mid-scale on one of the scales, and readings on the other scales should be observed. Readings should be within 20% of the conventionally true value.

Model Procedures for Calibrating, Liquid Scintillation Counters, Gamma Counters, Gas Flow Proportional Counters, and Multichannel Analyzers

A radioactive sealed source used for calibrating instruments will do the following:

- Approximate the geometry of the samples to be analyzed
- Have its apparent source activity traceable by documented measurements to a standard certified to be within $\pm 5\%$ accuracy by NIST.
- Approximate the same energy and type of radiation as the samples that the calibrated device will be used to measure.

Calibration

- Calibration of survey instruments used in well logging procedures for assessing dose or exposure rates must be conducted at least every 6 months or after instrument servicing
- Calibration must produce readings within $\pm 20\%$ of the actual values over the range of the instrument
- Calibration of liquid scintillation counters will include quench correction.

Calibration Records

Calibration reports, for all survey instruments, should indicate the procedure used and the data obtained. The calibration record should include:

- The owner or user of the instrument
- A description of the instrument, including the manufacturer's name, model number, serial number, and type of detector
- A description of the calibration source, including the exposure rate at a specified distance or activity on a specified date
- For each calibration point, the calculated exposure rate or count rate, the indicated exposure rate or count rate, the deduced correction factor (the calculated exposure rate or count rate divided by the indicated exposure rate or count rate), and the scale selected on the instrument
- For instruments with external detectors, the angle between the radiation flux field and the detector (i.e., parallel or perpendicular)
- For instruments with internal detectors, the angle between radiation flux field and a specified surface of the instrument
- For detectors with removable shielding, an indication whether the shielding was in place or removed during the calibration procedure
- The exposure rate or count rate from a check source, if used
- The name of the person who performed the calibration and the date it was performed.

The following information should be attached to the instrument as a calibration sticker or tag:

- For exposure rate meters, the source isotope used to calibrate the instrument (with correction factors) for each scale
- The efficiency of the instrument, for each isotope the instrument will be used to measure (if efficiency is not calculated before each use)
- For each scale or decade not calibrated, an indication that the scale or decade was checked only for function but not calibrated
- The date of calibration and the next calibration due date
- The apparent exposure rate or count rate from the check source, if used.

References:

1. Draft Regulatory Guide FC 413-4, "*Guide for the Preparation of Applications for Licenses for the Use of Radioactive Materials in Calibrating Radiation Survey and Monitoring Instruments*", dated June 1985.
2. "*The Health Physics & Radiological Health Handbook, Revised Edition*", edited by Bernard Shleien, dated 1992.
3. ANSI N323A-1997, "*Radiation Protection Instrumentation Test and Calibration*".

Copies may be obtained from the American National Standards Institute, 1430 Broadway, New York, NY 10018 or ordered electronically at the following address: www.ansi.org.

Appendix N

Guidance for Demonstrating that Unmonitored Individuals are Not Likely to Exceed 10 Percent of the Allowable Limits

Guidance for Demonstrating that Unmonitored Individuals are Not Likely to Exceed 10 Percent of the Allowable Limits

Dosimetry is required for individual adults who are likely to receive in 1 year an occupational dose from sources external to the body in excess of 10% of the applicable regulatory limits in **902 KAR 100:019**. However, logging supervisors or logging assistants are required by **902 KAR 100:019, 902 KAR 100:142** to wear either a film badge, optically stimulated luminescent (OSL) badge, or a thermoluminescent dosimeter (TLD) when handling licensed tracer materials or sealed sources. In instances where pocket chambers are used instead of film badges or TLDs to assess radiation dosage of personnel who are not logging supervisors or logging assistants, a check of the response of the dosimeters to radiation should be made every 12 months. Acceptable pocket dosimeters should read within plus or minus 20% of the true radiation dose. To demonstrate to the agency that dosimetry is **not** required for non-logging personnel, a licensee needs to have available an evaluation demonstrating that these non-monitored workers are not likely to exceed 10% of the applicable annual limits — 5 mSv (500 millirems) per year.

The applicable Total Effective Dose Equivalent (whole body) limit is 50 mSv (5 rems) per year, and 10% of that value is 5 mSv (500 millirems) per year.

Three common ways that individuals may exceed 10% of the applicable limits are mishandling tracer radioisotopes, logging tools, or any devices containing sealed sources. However, most routine well logging or tracer activities result in minimal doses to well logging and tracer personnel. A licensee will need to conduct an evaluation of doses to occupationally exposed workers who could, in performing tasks involving the handling of radioactive materials, have a need for dosimetry.

Example: A careful radiation measurement using a survey meter of the location producing the highest dose rate at the rear of the logging truck where radioactive material is stored in its transport compartment and where mechanics routinely work, is found to be 0.015 mSv/hr (1.5 mrem/hr). Mechanics are not expected to spend any more than a total of 3 hours per week at the location near the storage containers where the sealed sources are housed at the rear of the truck. Based on this measured dose rate, the annual dose is expected to be less than 2.34 mSv (234 mrem). Specifically, $3 \text{ hr/wk} \times 1.5 \text{ mrem/hr} \times 52 \text{ wk/yr} = 234 \text{ mrem}$. Based on the above, if any mechanic works in the area less than 6.4 hours per week, no dosimetry is required.

Note: 6.4 hours is the total amount of hours it would take for an individual to meet the 5 mSv (500 millirems) per year limit.

Appendix O

Guidance for Demonstrating that Individual Members of the Public will not Receive Doses Exceeding the Allowable Limits

Guidance for Demonstrating that Individual Members of the Public will not Receive Doses Exceeding the Allowable Limits

Licensees must ensure that:

- The radiation dose received by individual members of the public does not exceed 1 mSv (100 mrem) in one calendar year resulting from the licensee's possession and/or use of licensed materials.

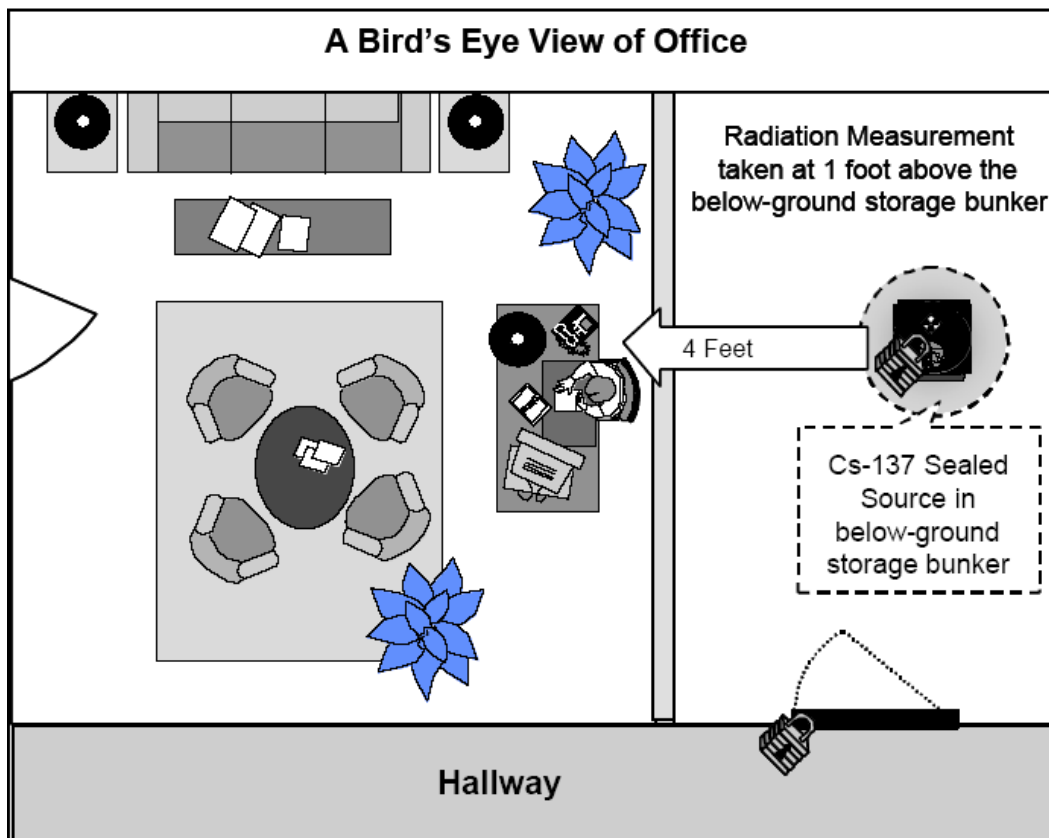
Members of the public include persons who live, work, or may be near locations where licensed material is used or stored and employees whose assigned duties do not include the use of licensed materials and who work in the vicinity where it is used or stored.

- The radiation dose in unrestricted areas does not exceed 0.02 mSv (2 mrem) in any one hour.

Typical unrestricted areas may include offices, shops, laboratories, areas outside buildings, property, and non-radioactive equipment storage areas. The licensee does not control access to these areas for purposes of controlling exposure to radiation or radioactive materials; however, the licensee may control access to these areas for other reasons, such as security.

Licensees must demonstrate compliance with both of the above regulations. For areas adjacent to facilities where licensed material is used or stored, calculations or a combination of calculations and measurements (e.g., using an environmental TLD) are often used to show compliance.

Figure 4. Bird's Eye View of Office.



Calculation Method

These measurements must be made with calibrated survey meters sufficiently sensitive to measure background levels of radiation. However, licensees must exercise caution when making these measurements, and they must use currently calibrated radiation survey instruments. A maximum dose of 1 mSv (100 mrem) received by an individual over a period of 2080 hours (i.e., a 'work year' of 40 hr/wk for 52 wk/yr) is equal to less than 0.5 microsievert (0.05 mrem) per hour.

This rate is well below the minimum sensitivity of most commonly available GM survey instruments.

Instruments used to make measurements for calculations must be sufficiently sensitive. An instrument equipped with a scintillation-type detector (e.g., NaI(Tl)) or a micro-R meter used in making very low gamma radiation measurements should be adequate.

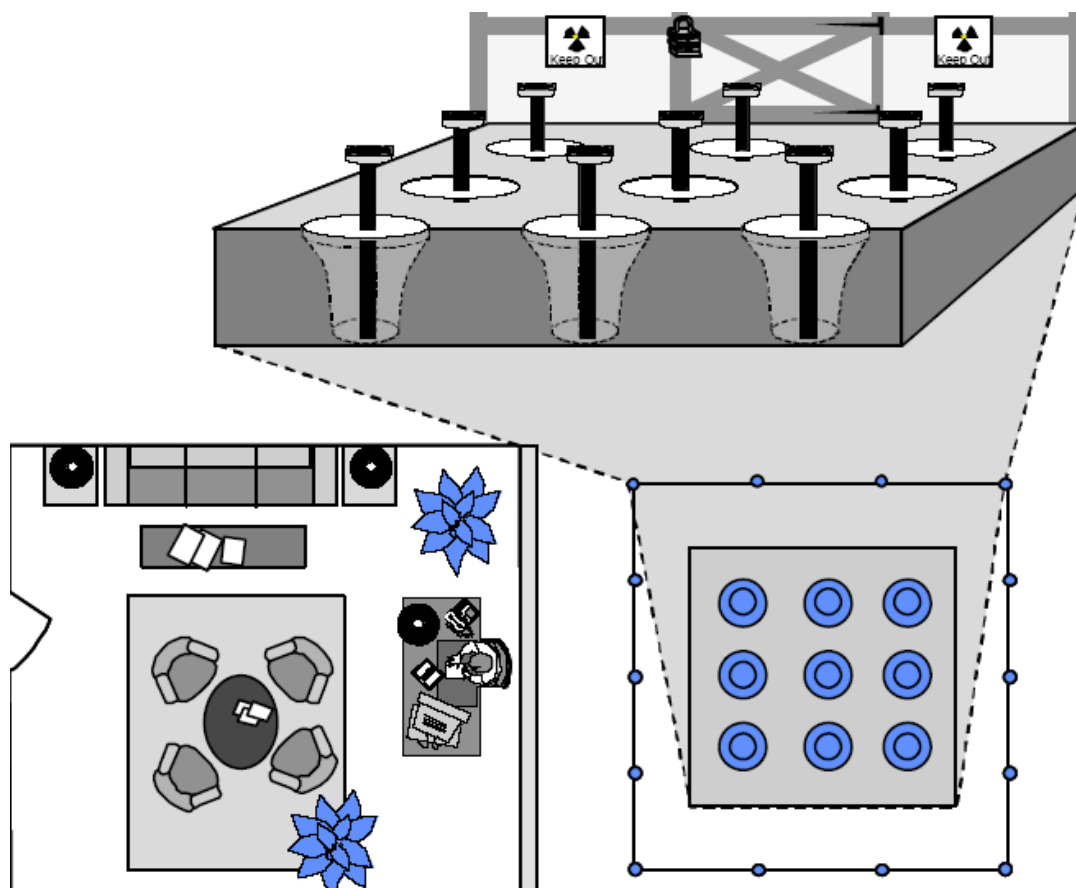
Licensees may also choose to use environmental TLDs in unrestricted areas next to the downhole source storage area for monitoring. This direct measurement method would provide a definitive measurement of actual radiation levels in unrestricted areas without any restrictive assumptions. Records of these measurements can then be evaluated to ensure that rates in unrestricted areas do not exceed the 1 mSv/yr (100 mrem/yr) limit.

TLDs used for personnel monitoring (e.g., LiF) may not have sufficient sensitivity for this purpose. Generally, the minimum reportable dose received is 0.1 mSv (10 mrem). Suppose a TLD monitors dose received and is changed once a month. If the measurements are at the minimum reportable level, the annual dose received could have been about 1.2 mSv (120 mrem), a value in excess of the 1 mSv/yr (100 mrem/yr) limit. If licensees use TLDs to evaluate compliance with the public dose limits, they should consult with their TLD supplier and choose more sensitive TLDs, such as those containing CaF₂ that are used for environmental monitoring.

The combined measurement-calculation method may be used to estimate the maximum dose to a member of the public. The combined measurement-calculation method takes a tiered approach, going through a two-part process, starting with a worst case situation and moving toward more realistic situations. It makes the following simplifications: (1) each Cesium-137 logging source is a point source; (2) typical radiation levels are encountered when the source is in the unshielded position; and (3) no credit is taken for any shielding found between the source storage area and the unrestricted areas. The method is only valid for the source activity at the time of measurement and must be repeated if the source strength or shielding is changed.

Part 1 of the combined measurement-calculation method is simple but conservative. It assumes that an affected member of the public is present 24 hours a day and uses only the inverse square law to determine if the distance between the downhole storage area and the affected member of the public is sufficient to show compliance with the public dose limits. Part 2 considers not only distance, but also the time that the affected member of the public is actually in the area under consideration. Using this approach, licensees make only those calculations that are needed to demonstrate compliance. The results of these calculations typically result in higher radiation levels than would exist at typical facilities, but they provide a method for estimating conservative doses that could be received.

Figure 5. Downhole Storage Array.



Example

To better understand the combined measurement-calculation method, we will examine EZ Well Logging, Inc., a well logging licensee. Yesterday, the company's president noted that the top shield of the downhole storage area is close to an area used by workers whose assigned duties do not include the use of licensed materials, and he asked Joe, the Radiation Safety Officer (RSO), to determine if the company is complying with KDPH's regulations.

The area in question is near the floor under the workers' desks, which constitutes the primary shield of the downhole storage area. Joe measures the distance from the shield to the center of the area in question and, using a calibrated survey instrument, measures the highest dose rate at one foot from the shield to be 2 mrem per hour.

Summary of Information

This is the information Joe has or has acquired on the downhole storage area: the dose rate at 1 foot from the top of the shield is 2 mrem/hr and the nearest occupied work area to the face of the shield is 4 ft.

Example: Part 1

Joe's first thought is that the distance between the downhole storage area shield and the area in question may be sufficient to show compliance with the regulation in **902 KAR 100:019**. So, taking a worst case approach, he assumes: 1) the Cesium-137 is constantly located in downhole storage area (i.e., 24 hr/d), and 2) the workers are constantly in the unrestricted work area (i.e., 24 hr/d). Joe proceeds to calculate the dose the workers might receive hourly and yearly from the source, as shown in **Table 12** below.

Step No.	Description	Input Data	Results
1	Multiply the measured dose rate measured at 1.0 ft from the face of the shield floor in mrem/hr by the square of the distance (ft) at which the measurement was made (e. g., 1 foot from the face of the shield)	$2 \times (1)^2$	2
2	Square the distance (ft) from the face of the shield to the nearest unrestricted area, in ft^2	$(4)^2$	16
3	Divide the result of Step 1 by the result of Step 2 to calculate the dose received by an individual in the area near the shield. HOURLY DOSE RECEIVED FROM SOURCE , in mrem in an hour	2/16	0.125
4	Multiply the result of Step 3 by 40 hr/work week x 52 weeks/year = MAXIMUM ANNUAL DOSE RECEIVED FROM Cs-137 Source , in mrem in a year	$0.125 \times 40 \times 52$	260

Table 12. Calculation Method, Part 1: Hourly and Annual Doses Received from a Logging Source Stored in Above Ground Transportation Container.

Note: The result in Step 3 demonstrates compliance with the 2 mrem in any one hour limit. Re-evaluate if assumptions change. If the result in Step 4 exceeds 100 mrem/yr, proceed to Part 2 of the calculation method.

At this point, Joe is pleased to see that the total dose that an individual could receive in any one hour is only 0.125 mrem in an hour, less than the 2 mrem in any one hour limit but notes that an individual could receive a dose of 260 mrem in a year, higher than the 100 mrem limit.

Example: Part 2 (Table 13)

Joe reviews the assumptions and recognizes that the workers are not in area near the shield all of the time. A realistic estimate of the number of hours the workers spend in the area is made, keeping the other assumptions constant (i.e., the source is constantly in the downhole storage area (i.e., 24 hr/d). The annual dose received is then recalculated.

Table 13

Step No.	Description	Results
7.	A. Average number of hours per day an individual spends in area of concern (e.g., a non-radiation worker spends 1.5 hr/day in area near the shield; the remainder of the day the workers are away from the area assigned to jobs unrelated to radiation)	1.5552
	B. Average number of days per week in area	5
	C. Average number of weeks per year in area (e.g., full time workers)	52
8.	Multiply the results of Step 7.A. by the results of Step 7.B. by the results of Step 7.C. = AVERAGE NUMBER OF HOURS IN AREA OF CONCERN PER YEAR	$1.5 \times 5 \times 52 = 390$
9.	Multiply the results in Step 3 by the results of Step 8 = ANNUAL DOSE RECEIVED FROM CESIUM-137 LOGGING SOURCE CONSIDERING REALISTIC ESTIMATE OF TIME SPENT IN AREA OF CONCERN, in mrem in a year	$0.125 \times 390 = 49$

Table 13. Calculation Method, Part 2: Annual Dose Received from a Logging

Joe is pleased to note that the calculated annual dose received is significantly lower, and does not exceed the 100 mrem in a year limit. Had the result in Step 9 been higher than 100 mrem in a year, then Joe would have not been in compliance and could have done one or more of the following:

- Consider whether the assumptions used to determine occupancy are accurate, revise the assumptions as needed, and recalculate using any new assumptions
- Calculate the effect of any shielding located between the storage area and the floor of the public area — such calculation is beyond the scope of this Appendix
- Take corrective action (e.g., change work patterns to reduce the time spent in the area near the shield) and perform new calculations to demonstrate compliance
- Designate the area inside the use area as a restricted area and the workers as occupationally exposed individuals. This would require controlling access to the area for purposes of radiation protection and training the workers as required by **902 KAR 100:040, 902 KAR 100:142.**

Reference: National Council on Radiation Protection and Measurements (NCRP) Report No. 49, “*Structural Shielding Design and Evaluation for Medical Use of X Rays and Gamma Rays of Energies Up to 10 MeV*”, contains helpful information. It is available from NCRP, 7910 Woodmont Avenue, Suite 800, Bethesda, Maryland 20814. NCRP’s telephone numbers are: (301) 657-2652 or 1-800-229-2652.

Note that in the example, Joe evaluated the unrestricted area outside only one wall of the downhole storage area. Licensees also need to make similar evaluations for other unrestricted areas and to keep in mind the ALARA principle, taking reasonable steps to keep radiation dose received below regulatory requirements. In addition, licensees need to be alert to changes in situations (e.g., adding sources to the storage area, changing the work habits of the workers, or otherwise changing the estimate of the portion of time spent in the area in question) and to perform additional evaluations, as needed.

RECORD KEEPING: 902 KAR 100:019 requires licensees to maintain records demonstrating compliance with the dose limits for individual members of the public.

Appendix P

Notification in the Event of an Accident

Notification of Proper Persons in the Event of an Accident

Emergency Procedure

Notify the persons listed below of the situation, in the order shown.

Name*	Work Phone Number*	Home Phone Number*
Radiation Safety Officer (RSO)		
Senior Logging Supervisors		
Manufacturers/Distributors		
Consultant		

* Fill in with (and update, as needed) the names and telephone numbers of appropriate personnel (e.g., the Radiation Safety Officer (RSO) or other knowledgeable licensee staff, licensee's consultant, device manufacturer, etc.) to be contacted in case of emergency. Follow the directions provided by the person contacted above.

RSO and Licensee Management

Discuss emergency operating procedures, and ensure no operations are conducted until the situation has been discussed with and approved by the RSO or other knowledgeable staff, consultants, or the device manufacturer. Management should have access to emergency equipment to keep doses as low as reasonably achievable. Emergency equipment may include special survey equipment.

Notify local authorities as well as the agency, as required. (Even if notification is not required, ANY incident may be reported to the agency by calling the emergency number at (502) 564-3700 during business hours or (800) 255-2587, which is staffed 24 hours a day; identify emergency as radiological.) Agency notification is required when sources or devices containing licensed material are lost or stolen and when sealed or unsealed radioactive material or equipment is involved in incidents that may have caused or that threaten to cause an exposure in excess of **902 KAR 100:019** limits. Reports to the agency must be made within the reporting time frames specified by the regulations. Notification and reporting requirements are found in **902 KAR 100:040**

Table 14 Notifications

Event	Telephone Notification	Written Report	Rule Requirement
Theft or loss of material	Immediate	30 days	902 KAR 100:019
Whole body dose greater than 0.25 Sv (25 rems)	Immediate	30 days	902 KAR 100:019
Extremity dose greater than 2.5 Sv (250 rems)	Immediate	30 days	902 KAR 100:019
Whole body dose greater than 0.05 Sv (5 rems) in 24 hours	24 hours	30 days	902 KAR 100:019
Extremity dose greater than 0.5 Sv (50 rems) in 24 hours	24 hours	30 days	902 KAR 100:019
Whole body dose greater than 0.05 Sv (5 rems)	None	30 days	902 KAR 100:019
Dose to individual member of public greater than 1 mSv (100 rems)	None	30 days	902 KAR 100:019
Defect in equipment that could create a substantial safety hazard	2 days	30 days	902 KAR 100:040, 902 KAR 100:019
Event that prevents immediate protective actions necessary to avoid exposure to radioactive materials that could exceed KDPH limits	Immediate	30 days	902 KAR 100:040
Equipment is disabled or fails to function as designed when required to prevent radiation exposure in excess of KDPH limits	24 hours	30 days	902 KAR 100:040
Unplanned fire or explosion that affects the integrity of any licensed material or device, container, or equipment with licensed material	24 hours	30 days	902 KAR 100:040
Rupture of sealed source	Immediate	30 days	902 KAR 100:142
Sealed source becomes lodged in well bore and becomes classified as irretrievable, or licensee is requesting an extension to complete abandonment procedures	24 hours	30 days	902 KAR 100:142
Leak test of sealed source resulting in leakage greater than 185 Bq (0.005 microcuries)	None	5 days	902 KAR 100:142
Failure of any component to perform its intended function	None	30 days	902 KAR 100:142, 10 CFR 21.21

Table 14. KDPH Notifications.

Note: Telephone notifications shall be made to the agency at (502) 564-3700 during business hours; or (800) 255-2587, which is staffed 24 hours a day. Identify the emergency as radiological.

Appendix Q

Model Leak Test Program

Model Leak Test Program

Training

Before allowing an individual to perform leak test analysis independently, the RSO will ensure that the individual has sufficient classroom and on-the-job training to show competency in performing leak test analysis.

Classroom training in the performance of leak test analysis may be provided in the form of lecture, videotape, or self-study. This should cover the following subject areas:

- Principles and practices of radiation protection
- Radioactivity measurements, monitoring techniques, and using instruments
- Mathematics and calculations basic to using and measuring radioactivity
- Biological effects of radiation.

Appropriate on-the-job training consists of:

- Observing authorized personnel collecting and analyzing leak test samples
- Collecting and analyzing leak test samples under the supervision and in the physical presence of an individual authorized to perform leak tests and leak test analysis

Facilities and Equipment

- To ensure the required sensitivity of measurements, leak tests will be analyzed in a low-background area.
- Before leak test swipes are analyzed, individuals conducting leak tests will use a calibrated and operable survey instrument to check leak test samples for gross contamination. If the sensitivity of the counting system is unknown, the minimum detectable activity (MDA) needs to be determined. The MDA may be determined using the following formula:

$$MDA = \frac{3 + 4.65(BR)^{1/2}}{Et}$$

where MDA = activity level in disintegrations per minute (dpm)

BR = background rate in counts per minute (cpm)

t = counting time in minutes

E = detector efficiency in counts per disintegration (cpd)

For example:

where BR = 200 cpm

E = 0.1 cpd (10% efficient)

t = 2 minutes

$$MDA = \frac{3 + 4.65(200 \text{ cpm})^{1/2}}{(0.1 \text{ cpd})(2 \text{ minutes})}$$

A NaI(Tl) well counter system with a single or multi-channel analyzer will be used to count samples from sealed sources containing gamma-emitters (e.g., Cesium-137, Cobalt-60). A liquid scintillation, gas-flow proportional, or solid state counting system will be used to count samples containing alpha-emitters (e.g., Americium-241).

Frequency for Conducting Leak Tests of Sealed Sources

Leak tests on well logging sealed sources will be conducted at intervals not to exceed 6 months, or, for Energy Compensation Sources (ECS) requiring leak tests, at intervals not to exceed 3 years.

Procedure for Performing Leak Testing and Analysis

- For each source to be tested, list identifying information such as the manufacturer's name, model number, serial number, radionuclide, and activity of the sealed source(s).
- Prepare a separate wipe sample (e.g., cotton swab or filter paper) for each source.
- Number each wipe to correlate with identifying information for each source.
- If available, use a survey meter to monitor exposure.
- Wipe the most accessible area (but not directly from the surface of the source) where contamination would accumulate if the sealed source were leaking, (e.g., the leak test can be taken of the part that connects to the source or the inside of the transport container that has recently transported the source).
- Select an instrument that is sensitive enough to detect 185 Bq (0.005 mCi) of the radionuclide of the sealed source.
- Using the selected instrument, count and record background count rate.
- Check the instrument's counting efficiency using a standard source of the same radionuclide as the source being tested or one with similar energy characteristics. Accuracy of standards should be within $\pm 5\%$ of the stated value and traceable to primary radiation standard, such as those maintained by the National Institutes of Standards and Technology (NIST).
- Calculate efficiency.

$$\text{For example: } \frac{[(\text{cpm from std}) - (\text{cpm from bkg})]}{\text{activity of std in Bq}} = \text{efficiency in cpm/Bq}$$

where: cpm = counts per minute

std = standard

bkg = background

Bq = Becquerel

- Count each wipe sample; determine net count rate.
- For each sample, calculate and record estimated activity in Bq (or Ci).
For example: $\frac{[(\text{cpm from wipe sample}) - (\text{cpm from bkg})]}{\text{efficiency in cpm/Bq}} = \text{Bq on wipe sample}$
- Sign and date the list of sources, data, and calculations. Retain records for 5 years (**902 KAR 100:060**).

If the wipe test activity is 185 Bq (0.005 microcurie) or greater, notify the RSO, so that the source can be withdrawn from use and disposed of properly. Also notify the agency.

Appendix R

Transportation - Major DOT Regulations; Sample Shipping Documents, Placards and Labels

Transportation - Major DOT Regulations; Sample Shipping Documents, Placards and Labels

The major areas in the DOT regulations that are most relevant for transportation of licensed material shipped as Type A quantities are as follows:

- Hazardous Materials Table, **49 CFR 172.101**, App. A, list of hazardous substances and reportable quantities (RQ), Table 2: Radionuclides
- Shipping Papers **49 CFR 172.200-204**: General entries, description, additional description requirements, shipper's certification
- Package Markings **49 CFR 172.300, 49 CFR 172.301, 49 CFR 172.303 49 CFR 172.304, 49 CFR 172.310, 49 CFR 172.324**: General marking requirements for non-bulk packaging, prohibited marking, marking requirements, radioactive material, hazardous substances in non-bulk packaging
- Package Labeling **49 CFR 172.400, 49 CFR 172.401, 49 CFR 172.403, 49 CFR 172.406, 49 CFR 172.407, 49 CFR 172.436, 49 CFR 172.438, 49 CFR 172.440**: General labeling requirements, prohibited labeling, radioactive materials, placement of labels, specifications for radioactive labels
- Placarding of Vehicles **49 CFR 172.500, 49 CFR 172.502, 49 CFR 172.504, 49 CFR 172.506, 49 CFR 172.516, 49 CFR 172.519, 49 CFR 172.556**: Applicability, prohibited and permissible placarding, general placarding requirements, providing and affixing placards: highway, visibility and display of placards, specifications for RADIOACTIVE placards
- Emergency Response Information, **Subpart G, 49 CFR 172.600, 49 CFR 172.602, 49 CFR 172.604**: Applicability and general requirements, emergency response information, emergency response telephone number
- Training, **Subpart H, 49 CFR 172.702, 49 CFR 172.704**: Applicability and responsibility for training and testing, training requirements
- Shippers - General Requirements for Shipments and Packaging, **Subpart I, 49 CFR 173.403, 49 CFR 173.410, 49 CFR 173.412, 49 CFR 173.415, 49 CFR 173.431, 49 CFR 173.433, 49 CFR 173.435, 49 CFR 173.441, 49 CFR 173.443, 49 CFR 173.448, 49 CFR 173.475, 49 CFR 173.476**: Definitions, general design requirements, additional design requirements for Type A packages, authorized Type A packages, activity limits for Type A packages, requirements for determining A₁ and A₂ values, table of A₁ and A₂ values for radionuclides, radiation level limitations, contamination control, general transportation requirements, quality control requirements prior to each shipment, approval of special form radioactive materials
- Carriage by Public Highway - General Information and Regulations, **Subpart A, 49 CFR 177.816, 49 CFR 177.817, 49 CFR 177.834(a), 49 CFR 177.842**: Driver training, shipping paper, general requirements (secured against movement), Class 7 (radioactive) material.

The following are the major areas in DOT regulations most relevant for transporting licensed material that is shipped as Type B quantities in addition to the applicable requirements stated above:

A. Package Markings

49 CFR 172.310 - Radioactive material [Type B]

B. Shippers - General Requirements for Shipments and Packaging - **49 CFR 173**

1. **49 CFR 173.25** - Requirements for use and labeling of overpacks
2. **49 CFR 173.403** - Definitions
3. **49 CFR 173.411** - General design requirements
4. **49 CFR 173.413** - Additional design requirements for Type B packages
5. **49 CFR 173.416** - Authorized Type B packages [includes packaging certification requirements]
6. **49 CFR 173.471** - Additional requirements for Type B packages approved by NRC

Sample Shipping Documents, Placards and Labels

Hazard Communications for Class 7 (Radioactive) Materials

DOT Shipping Papers (49 CFR 172.200-205)

NOTE: IAEA, ICAO, and IMO may require additional hazard communication information for international shipments
This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

Entries Always Required Unless Excepted	Additional Entries Sometimes Required	Optional Entries
<p>! The basic description, in sequence: Proper Shipping Name, Hazard Class (7), U.N. Identification Number</p> <p>! 24 hour emergency response telephone number</p> <p>! Name of shipper</p> <p>! Proper page numbering (Page 1 of 4)</p> <p>! Except for empty and bulk packages, the total quantity (mass, or volume for liquid), in appropriate units (lbs, mL....)</p> <p>! If not special form, chemical and physical form</p> <p>! The name of each radionuclide (95% rule) and total package activity. The activity must be in SI units (e.g., Bq, TBq), or both SI units and customary units (e.g., Ci, mCi). However, for domestic shipments, the activity may be expressed in terms of customary units only, until 4/1/97.</p> <p>! For each labeled package: - The category of label used; - The transport index of each package with a Yellow-II or Yellow-III label</p> <p>! Shipper's certification (not required of private carriers)</p>	<p><u>Materials-Based Requirements:</u></p> <p>! If hazardous substance, "RQ" as part of the basic description</p> <p>! The LSA or SCO group (e.g., LSA-II)</p> <p>! "Highway Route Controlled Quantity" as part of the basic description, if HRCQ</p> <p>! Fissile material information (e.g., "Fissile Exempt," controlled shipment statement [see §172.203(d)(7)])</p> <p>! If the material is considered hazardous waste and the word waste does not appear in the shipping name, then "waste" must precede the shipping name (e.g., Waste Radioactive Material, nos, UN2982)</p> <p>! "Radioactive Material" if not in proper shipping name</p> <p><u>Package-Based Requirements:</u></p> <p>! Package identification for DOT Type B or NRC certified packages</p> <p>! IAEA CoC ID number for export shipments or shipments using foreign-made packaging (see §173.473)</p> <p><u>Administrative-Based Requirements:</u></p> <p>! "Exclusive Use-Shipment"</p> <p>! Instructions for maintenance of exclusive use-shipment controls for LSA/SCO strong-tight or NRC certified LSA (§ 173.427)</p> <p>! If a DOT exemption is being used, "DOT-E" followed by the exemption number</p>	<p>! The type of packaging (e.g., Type A, Type B, IP-1,)</p> <p>! The Technical/chemical name may be included (if listed in §172.203(k), in parentheses between the proper shipping name and hazard class; otherwise inserted in parenthesis after the basic description)</p> <p>! Other information is permitted (e.g., functional description of the product), provided it does not confuse or detract from the proper shipping name or other required information</p> <p>! For fissile radionuclides, except Pu-238, Pu-239, and Pu-241, the weight in grams or kilograms may be used <i>in place of</i> activity units. For Pu-238, Pu-239, and Pu-241, the weight in grams or kilograms may optionally be entered <i>in addition to</i> activity units [see § 172.203(d)(4)]</p> <p>! Emergency response hazards and guidance information (§§ 172.600-604) may be entered on the shipping papers, or may be carried with the shipping papers [§ 172.602(b)]</p>



Some Special Considerations/Exceptions for Shipping Paper Requirements

<p>! Shipments of Radioactive Material, excepted packages, under UN2910 (e.g., Limited Quantity, Empty packages, and Radioactive Instrument and Article), are excepted from shipping papers. For limited quantities (§173.421), this is only true if the limited quantity is not a hazardous substance (RQ) or hazardous waste (40 CFR 262)</p> <p>! Shipping papers must be in the pocket on the left door, or readily visible to person entering driver's compartment and within arm's reach of the driver</p> <p>! For shipments of multiple cargo types, any HAZMAT entries must appear as the first entries on the shipping papers, be designated by an "X" (or "RQ") in the hazardous material column, <u>or</u> be highlighted in a contrasting color</p>
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Hazard Communications for Class 7 (Radioactive) Materials

Marking Packages (49 CFR 172.300-338)

NOTE: IAEA, ICAO, and IMO may require additional hazard communication information for international shipments
This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

Markings Always Required Unless Excepted	Additional Markings Sometimes Required	Optional Markings
<p><u>Non-Bulk Packages</u></p> <ul style="list-style-type: none"> ! Proper shipping name ! U.N. identification number ! Name and address of consignor or consignee, <i>unless</i>: <ul style="list-style-type: none"> - highway only and no motor carrier transfers, <u>or</u> - part of carload or truckload lot or freight container load, and entire contents of railcar, truck, or freight container are shipped from one consignor to one consignee [see §172.301(d)] <hr style="border-top: 1px dashed black;"/> <p><u>Bulk Packages</u> (i.e., net capacity greater than 119 gallons as a receptacle for liquid, or 119 gallons and 882 pounds as a receptacle for solid, or water capacity greater than 1000 lbs, with no consideration of intermediate forms of containment)</p> <ul style="list-style-type: none"> ! U.N. identification number, on orange, rectangular panel (see §172.332) - some exceptions exist 	<p><u>Materials-Based Requirements:</u></p> <ul style="list-style-type: none"> ! If in excess of 110 lbs (50 kg), Gross Weight ! If non-bulk <u>liquid</u> package, underlined double arrows indicating upright orientation (two opposite sides) [ISO Std 780-1985 marking]  ! If a Hazardous substance in non-bulk package, the letters "RQ" in association with the proper shipping name <p><u>Package-Based Requirements:</u></p> <ul style="list-style-type: none"> ! The package type if Type A or Type B (½" or greater letters) ! The specification-required markings [e.g., for Spec. 7A packages: "DOT 7A Type A" and "Radioactive Material" (see §178.350-353)] ! For approved packages, the certificate ID number (e.g., USA/9166/B(U), USA/9150/B(U)-85, ...) ! If Type B, the trefoil (radiation) symbol per Part 172 App. B [size: outer radius ≥ 20 mm (0.8 in)]  ! For NRC certified packages, the model number, gross weight, and package ID number (10 CFR 71.85) <p><u>Administrative-Based Requirements:</u></p> <ul style="list-style-type: none"> ! If a DOT exemption is being used, "DOT-E" followed by the exemption number ! If an export shipment, "USA" in conjunction with the specification markings or certificate markings 	<ul style="list-style-type: none"> ! "IP-1," "IP-2," or "IP-3" on industrial packaging is recommended ! Both the name and address of consignor and consignee are recommended ! Other markings (e.g., advertising) are permitted, but must be sufficiently away from required markings and labeling

Some Special Considerations/Exceptions for Marking Requirements

- ! Marking is required to be: (1) durable, (2) printed on a package, label, tag, or sign, (3) unobscured by labels or attachments, (4) isolated from other marks, and (5) be representative of the hazmat contents of the package
- ! Limited Quantity (§173.421) packages and Articles Containing Natural Uranium and Thorium (§173.426) must bear the marking "radioactive" on the outside of the inner package or the outer package itself, and are excepted from other marking. The excepted packages shipped under UN 2910 must also have the accompanying statement that is required by §173.422.
- ! Empty (§173.428) and Radioactive Instrument and Article (§173.424) packages are excepted from marking
- ! Shipment of LSA or SCO required by §173.427 to be consigned as exclusive use are excepted from marking except that the exterior of each nonbulk package must be marked "Radioactive-LSA" or "Radioactive-SCO," as appropriate. Examples of this category are domestic, strong-tight containers with less than an A₂ quantity, and domestic NRC certified LSA/SCO packages using 10 CFR 71.52.
- ! For bulk packages, marking may be required on more than one side of the package (see 49 CFR 172.302(a))

Hazard Communications for Class 7 (Radioactive) Materials

Labeling Packages (49 CFR 172.400-450)




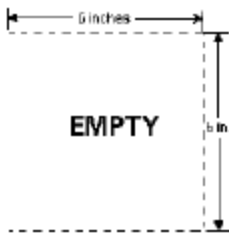
NOTE: IAEA, ICAO, and IMO may require additional hazard communication information for international shipments
This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

Placement of Radioactive Labels

Labeling is required to be: (1) placed **near the required marking** of the proper shipping name, (2) printed or affixed to the package surface (not the bottom), (3) in **contrast** with its background, (4) **unobscured** by markings or attachments, (5) within color, design, and size tolerance, and (6) **representative** of the HAZMAT contents of the package

For labeling of radioactive materials packages, **two labels** are required on **opposite sides** excluding the bottom

Determination of Required Label

Size:	Determination of Required Label			EMPTY LABEL
Size: Sides: ≥ 100 mm (3.9 in.) Border: 5-8.3 mm (0.2-0.25 in.)	 <p style="text-align: center;">49 CFR 172.436</p>	 <p style="text-align: center;">49 CFR 172.438</p>	 <p style="text-align: center;">49 CFR 172.440</p>	 <p style="text-align: center;">49 CFR 172.450</p>
Label	WHITE-I	YELLOW-II	YELLOW-III	EMPTY LABEL
Required when:	Surface radiation level < 0.005 Mew/hr (0.5 mem./hr)	0.005 Mew/hr (0.5 mem./hr) < surface radiation level ≤ 0.5 Mew/hr (50 mem./hr)	0.5 Mew/hr (50 mem./hr) < surface radiation level < 2 Mew/hr (200 mem./h) [Note: 10 Mew/hr (1000 mem./hr) for exclusive-use closed vehicle (§173.441(b))]	The EMPTY label is required for shipments of empty Class 7 (radioactive) packages made pursuant to §173.428. It must cover any previous labels, or they must be removed or obliterated.
Or:	TI = 0 [1 meter dose rate < 0.0005 Mew/hr (0.05 mem./hr)]	TI < 1 [1 meter dose rate < 0.01 Mew/hr (1 mem./hr)]	TI < 10 [1 meter dose rate < 0.1 Mew/hr (10 mem./hr)] [Note: There is no package TI limit for exclusive-use]	
Notes:	! Any package containing a Highway Route Controlled Quantity (HRCQ) must bear YELLOW-III label ! Although radiation level transport indices (TIs) are shown above, for fissile material, the TI is typically determined on the basis of criticality control			

Content on Radioactive Labels

- RADIOACTIVE Label must contain (entered using a durable, weather-resistant means):
- (1) The **radionuclides** in the package (with consideration of available space). Symbols (e.g., Co-60) are acceptable
 - (2) The **activity** in SI units (e.g., Bq, TBq), or both SI units with customary units (e.g., Ci, mCi) in parenthesis. However, for domestic shipments, the activity may be expressed in terms of customary units only, until 4/1/97.
 - (3) The **Transport Index (TI)** in the supplied box. The TI is entered *only* on YELLOW-II and YELLOW-III labels

Some Special Considerations/Exceptions for Labeling Requirements

- ! For materials meeting the definition of another hazard class, labels for each secondary hazard class need to be affixed to the package. The subsidiary label may not be required on opposite sides and must not display the hazard class number
- ! Radioactive Material, excepted packages, under UN2910 (e.g., Limited Quantity, Empty packages, and Radioactive Instrument and Article), are exempted from labeling. However, if the excepted quantity meets the definition for another hazard class, it is re-classified for that hazard. Hazard communication requirements for the other class are required
- ! Labeling exceptions exist for shipment of LSA or SCO required by § 173.427 to be consigned as exclusive use
- ! The "Cargo Aircraft Only" label is typically required for radioactive materials packages shipped by air (§ 172.402(c))

Hazard Communications for Class 7 (Radioactive) Materials

Placarding Vehicles (49 CFR 172.500-560)

NOTE: IAEA, ICAO, and IMO may require additional hazard communication information for international shipments
This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials




Visibility and Display of Radioactive Placard

- ! Placards are required to be displayed:
 - ! on **four sides** of the vehicle
 - ! visible from the direction they face (for the front side of trucks, tractor-front, trailer, or both are authorized)
 - ! clear of appurtenances and devices (e.g., ladders, pipes, tarpaulins)
 - ! at least **3 inches from any markings** (such as advertisements) which may reduce placard's effectiveness
 - ! upright and on-point such that the words read horizontally
 - ! in contrast with the background, or have a lined-border which contrasts with the background
 - ! such that dirt or water from the transport vehicle's wheels will not strike them
 - ! securely attached or affixed to the vehicle, or in a **holder**.
- ! Placard must be maintained by carrier to keep **color, legibility, and visibility**.

Conditions Requiring Placarding

- ! Placards are required for any vehicle containing package with a **RADIOACTIVE Yellow-III label**
- ! Placards are required for shipment of **LSA or SCO** required by §173.427 to be consigned as **exclusive use**. Examples of this category are domestic, strong-tight containers with less than an A_2 quantity, and domestic NRC certified LSA/SCO packages using 10 CFR 71.52. Also, for bulk packages of these materials, the orange panel marking with the UN Identification number is not required.
- ! Placards are required any vehicle containing package with a Highway Route Controlled Quantity (**HRCQ**). In this case, the placard must be placed in a square background as shown below (see §173.507(a))

Radioactive Placard

<p>Size Specs:</p> <p>Sides: ≥ 273 mm (10.8 in.)</p> <p>Solid line inner border: About 12.7 mm (0.5 in.) from edges</p> <p>Lettering: > 41 mm (1.6 in.)</p> <p>Square for HRCQ: 387mm (15.25 in.) outside length by 25.4 mm (1 in.) thick</p>	 <p style="font-size: small;">49 R §.556 CF 172</p>	 <p style="font-size: small;">IAE § 5 §. 443-444 A.55 (196 para See CF</p>	 <p style="font-size: small;">49 R 172.527 AND 556</p>
	<p>RADIOACTIVE PLACARD (Domestic)</p> <p style="font-size: x-small;">Base of yellow solid area: 29 ± 5 mm (1.1 \pm 0.2 in.) above horizontal centerline</p>	<p>RADIOACTIVE PLACARD (International)</p>	<p>RADIOACTIVE PLACARD FOR HIGHWAY ROUTE CONTROLLED QUANTITY (either domestic or international placard could be in middle)</p>

Some Special Considerations/Exceptions for Placarding Requirements

- ! Domestically, substitution of the UN ID number for the word "RADIOACTIVE" on the placard is prohibited for Class 7 materials. However, some import shipments may have this substitution in accordance with international regulations.
- ! Bulk packages require the orange, rectangular panel marking containing the UN ID number, which must be placed adjacent to the placard (see §172.332) [NOTE: except for LSA/SCO exclusive use under §173.427, as above]
- ! If placarding for more than one hazard class, subsidiary placards must not display the hazard class number. Uranium Hexafluoride (UF_6) shipments ≥ 454 kg (1001 lbs) require both RADIOACTIVE and CORROSIVE (Class 8) placarding
- ! For shipments of radiography cameras in convenience overpacks, if the overpack does not require a RADIOACTIVE - YELLOW III label, vehicle placarding is not required (regardless of the label which must be placed on the camera)

Minimum Required Packaging For Class 7 (Radioactive) Materials

This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

Quantity:	< 70 Bq/g (< 0.002 Ci/g)	Limited Quantity (§173.421)	A ₁ /A ₂ value (§173.435)	1 rem/yr at 3 m, unshielded (§173.427)
Non-LSA/SCO:	Excepted	Type A	Type B ³	
Domestic or International LSA/SCO:	Excepted	IP-I	Type B ³	
LSA-I solid, (liquid) ¹ SCO-I		IP-II	Type B ³	
LSA-I Liquid LSA-II Solid, (liquid or gas) ¹ (LSA-III) ¹ SCO-II		IP-III	Type B ³	
LSA-II Liquid or Gas LSA-III	Excepted	Strong-tight ²	DOT Spec. 7A Type A	Type B ³ NRC Type A LSA ^{3,4}
Domestic (only) LSA/SCO: LSA-I, II, III; SCO-I, II	Excepted	Strong-tight ²	DOT Spec. 7A Type A	Type B ³ NRC Type A LSA ^{3,4}

1. For entries in parentheses, exclusive use is required for shipment in an IP (e.g., shipment of LSA-I liquid in an IP-I packaging would require exclusive use consignment)
2. Exclusive use required for strong-tight container shipments made pursuant to §173.427(b)(2)
3. Subject to conditions in Certificate, if NRC package
4. Exclusive use required, see §173.427(b)(4). Use of these packages expires on 4/1/99 (10 CFR 71.52)

Package and Vehicle Radiation Level Limits (49 CFR 173.441)^A

This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

Transport Vehicle Use:	Non-Exclusive	Exclusive		
Transport Vehicle Type:	Open or Closed	Open (flat-bed)	Open w/Enclosure ^B	Closed

Package (or freight container) Limits:

External Surface	2 Mev/hr (200 mem./hr)	2 Mev/hr (200 mem./hr)	10 Mev/hr (1000 mem./hr)	10 Mev/hr (1000 mem./hr)
Transport Index (TI) ^C	10	no limit		

Roadway or Railway Vehicle (or freight container) Limits:

Any point on the outer surface	N/A	N/A	N/A	2 Mev/hr (200 mem./hr)
Vertical planes projected from outer edges		2 Mev/hr (200 mem./hr)	2 Mev/hr (200 mem./hr)	N/A
Top of . . .		load: 2 mSv/hr (200 mem./hr)	enclosure: 2 Mev/hr (200 mem./hr)	vehicle: 2 Mev/hr (200 mem./hr)
2 meters from . . .		vertical planes: 0.1 Mev/hr (10 mem./hr)	vertical planes: 0.1 Mev/hr (10 mem./hr)	outer lateral surfaces: 0.1 Mev/hr (10 mem./hr)
Underside	2 Mev/hr (200 mem./hr)			
Occupied position	N/A ^D	0.02 Mev/hr (2 mem./hr) ^E		
Sum of package TI's	50	no limit ^F		

- A. The limits in this table do not apply to excepted packages - see 49 CFR 173.421-426
- B. Securely attached (to vehicle), access-limiting enclosure; package personnel barriers are considered as enclosures
- C. For nonfissile radioactive materials packages, the dimensionless number equivalent to maximum radiation level at 1 m (3.3 feet) from the exterior package surface, in millirem/hour
- D. No dose limit is specified, but separation distances apply to Radioactive Yellow-II or Radioactive Yellow-III labeled packages
- E. Does not apply to private carrier wearing dosimetry if under radiation protection program satisfying 10 CFR 20 or 49 CFR 172 Subpart I
- F. Some fissile shipments may have combined conveyance TI limit of 100 - see 10 CFR 71.59 and 49 CFR 173.457

Package and Vehicle Contamination Limits (49 CFR 173.443)

This table must not be used as a substitute for the DOT and NRC regulations on the transportation of radioactive materials

NOTE: All values for contamination in DOT rules are to be averaged over each 300 cm². Sufficient measurements must be taken in the appropriate locations to yield representative assessments

- means the sum of beta emitters, gamma emitters, and low-toxicity alpha emitters
- Ⓐ means the sum of all other alpha emitters (i.e., other than low-toxicity alpha emitters)

<p>The Basic Contamination Limits for All Packages: 49 CFR 173.443(a), Table 11</p>	<p>General Requirement:</p>	<p>Non-fixed (removable) contamination must be kept as low as reasonably achievable (ALARA)</p>
	<p>•••: $0.4 \text{ Bq/cm}^2 = 40 \text{ Bq/100 cm}^2 = 1 \times 10^{-5} \cdot \text{Ci/cm}^2 = 2200 \text{ dpm/100 cm}^2$</p>	
	<p>Ⓐ: $0.04 \text{ Bq/cm}^2 = 4 \text{ Bq/100 cm}^2 = 1 \times 10^{-6} \cdot \text{Ci/cm}^2 = 220 \text{ dpm/100 cm}^2$</p>	

The following exceptions and deviations from the above basic limits exist:

Deviation from Basic Limits	Regulation 49 CFR §§	Applicable Location and Conditions Which must Be Met:
10 times the basic limits	173.443(b) and 173.443(c) Also see 177.843 (highway)	On any external surface of a package in an exclusive use shipment, during transport including end of transport. Conditions include: (1) Contamination levels at beginning of transport must be below the basic limits. (2) Vehicle must not be returned to service until radiation level is shown to be $\leq 0.005 \text{ Mev/hr}$ (0.5 mem./hr) at any accessible surface, and there is no significant removable (non-fixed) contamination.
10 times the basic limits	173.443(d) Also see 177.843 (highway)	On any external surface of a package, at the beginning or end of transport, if a closed transport vehicle is used, solely for transporting radioactive materials packages. Conditions include: (1) A survey of the interior surfaces of the empty vehicle must show that the radiation level at any point does not exceed 0.1 Mev/hr (10 mem./hr) at the surface, or 0.02 Mev/hr (2 mem./hr) at 1 meter (3.3 ft). (2) Exterior of vehicle must be conspicuously stenciled, " For Radioactive Materials Use Only " in letters at least 76 mm (3 inches) high, on both sides. (3) Vehicle must be kept closed except when loading and unloading.
100 times the basic limits	173.428	Internal contamination limit for excepted package-empty packaging , Class 7 (Radioactive) Material, shipped in accordance with 49 CFR 173.428. Conditions include: (1) The basic contamination limits (above) apply to external surfaces of package. (2) Radiation level must be $\leq 0.005 \text{ Mev/hr}$ (0.5 mem./hr) at any external surface. (3) Notice in §173.422(a)(4) must accompany shipment. (4) Package is in unimpaired condition & securely closed to prevent leakage. (5) Labels are removed, obliterated, or covered, and the "empty" label (§172.450) is affixed to the package.

In addition, **after any incident** involving spillage, breakage, or suspected contamination, the modal-specific DOT regulations (§177.861(a), highway; §174.750(a), railway; and §175.700(b), air) specify that vehicles, buildings, areas, or equipment have "no significant removable surface contamination," before being returned to service or routinely occupied. The carrier must also notify offeror at the earliest practicable moment after incident.

		DATE SHIP DATE	P.O. NO.	SHIPPER NO.	
CONSIGNEE RED E. WAITING		SHIPPER/CONSIGNOR (FROM) ABC PAVING COMPANY			
DEF PAVING INTERNATIONAL		456 MAIN STREET			
123 DIRT ROAD		ANY OTHER TOWN, USA 67890			
ANYTOWN, USA 12345					
PHONE NO.	EMERGENCY RESPONSE NUMBER (REQUIRED IN HM COLUMN MARKED) 123-456-7890			ROUTE	
Number of Packages	H M *	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (lb)	Class or Rate Ref.	Cube (Optional)
1	x	RQ, UN3332, Radioactive Material, Type A			
		Package, Special Form, 7,			
		Cs-137, 0.30 GBq (8.0 mCi)			
		Am-241, 1.48 GBq (40 mCi)			
		Radioactive Yellow II Label, TI = 0.3			
		Dim 35 x 45 x 78 cm			
		Emergency Contact: (123) 456-7890			
THIS IS TO CERTIFY THAT THE ABOVE-NAMES MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.					
SHIPPER/CONSIGNOR WANDA SHIPPITT			CARRIER SB FREIGHTWAYS		
AUTHORIZED SIGNATURE DATE			AUTHORIZED SIGNATURE		

Appendix S

Waste Management Procedures

Waste Management Procedures

Waste Disposal Program

General Guidelines

- A. All radioactivity labels must be defaced or removed from containers and packages prior to disposal. If non-radioactive waste is compacted, all radioactivity labels that are visible in the compacted mass must be defaced or removed.
- B. Remind workers that non-radioactive waste should not be mixed with radioactive waste.
- C. Occasionally monitor all procedures to ensure that radioactive waste is not created unnecessarily. Review all new procedures to ensure that waste is handled in a manner consistent with established operating and emergency procedures.
- D. Evaluate the entire impact of various available disposal routes. Consider occupational and public exposure to radiation, other hazards associated with the material and routes of disposal (e.g., toxicity, carcinogenicity, pathogenicity, flammability), and costs.
- E. Waste management program should include waste handling procedures. Also, procedures should be available for well logging personnel who may collect waste from areas of use to bring to the storage area for eventual disposal.

Model Procedure for Disposal by Decay-in-Storage (DIS)

- A. Only short-lived waste (physical half-life of less than or equal to 120 days) may be disposed of by DIS.
- B. Short-lived waste should be segregated from long-lived waste (half-life greater than 120 days) at the source.
- C. Waste should be stored in suitable well-marked containers and the containers should provide adequate shielding.
- D. Liquid and solid wastes must be stored separately.
- E. When the waste container is full, it should be sealed. The sealed container should be identified with a label affixed or attached to it.
- F. The identification label should include the date when the container was sealed, the longest lived radioisotope in the container, date when ten half-lives of the longest-lived radioisotope will have transpired, and the initials of the individual who sealed the container. The container may be transferred to the DIS area.
- G. The contents of the container should be allowed to decay for at least 10 half-lives of the longest-lived radioisotope in the container. The decay interval beginning at the time the radioactive waste container is sealed and placed in storage for DIS should be used for calculations and projected removal times.
- H. Prior to disposal as ordinary trash, each container should be monitored as follows:
 - 1. Check the radiation detection survey meter for proper operation.
 - 2. Survey the contents of each container in a low background area.
 - 3. Remove any shielding from around the container.
 - 4. Monitor all surfaces of the container.
 - 5. Discard the contents as ordinary trash only if the surveys of the contents indicate no residual radioactivity, i.e., surface readings are indistinguishable from background.
 - 6. If the surveys indicate residual radioactivity, return the container to DIS area and contact the RSO for further instructions.
- I. If the surveys indicate no residual radioactivity, record the date when the container was sealed, the disposal date, type of waste (used or unused material, gloves, etc.), survey instrument used, and the initials of the individual performing surveys and disposing of the waste.

Model Procedure for Disposal of Liquids into Sanitary Sewerage

- A. Confirm that the liquid radioactive waste containing radioactive material being discharged is soluble or readily dispersible in water.
- B. Calculate the amount of each radioisotope that can be discharged by using the information from prior, similar discharges and the information in **902 KAR 100:021**
- C. Make sure that the amount of each radioisotope does not exceed the monthly and annual discharge limits specified in **902 KAR 100:021**.
- D. Record the date, radioisotope(s), estimated activity of each radioisotope, location where the material is discharged, and the initials of the individual discharging the radioactive waste.
- E. Liquid radioactive waste must be discharged only via designated locations.
- F. Discharge radioactive liquid waste slowly with water running from the faucet to dilute it.
- G. Survey the designated disposal locations and surrounding work surfaces to confirm that no residual material or contamination remains.
- H. Prior to leaving the area, decontaminate all areas or surfaces, if found to be contaminated.
- I. Maintain disposal records that identify each radioisotope and its quantity and the concentration that is released into the sanitary sewer system.

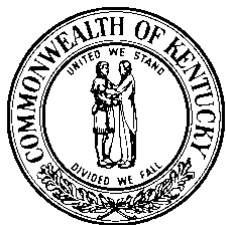
Kentucky Administrative Regulation 902 KAR 100:21, Section 12 requires each holder of a specific radioactive material license to annually file a report with KDPH regarding radioactive waste associated with activities authorized by the license.

The report shall be filed no later than January 15 of the year following the reporting period, whether that licensee was or was not a low level radioactive waste (LLRW) or radioactive mixed hazardous waste generator during the calendar year reporting period. Further information can be found at the Kentucky legislative Research Website at <http://www.lrc.ky.gov/kar/TITLE902.HTM>.

LLRW is only waste material which contains any regulated level of radioactivity, whether man made or naturally occurring. Radioactive material (RAM) becomes a waste when the generator has removed the RAM, and items contaminated with RAM, from the process or procedure in which it was used or produced, and segregated for disposal. **Even though many licensees do not produce such LLRW materials, the LLRW form must be completed and returned every year by the licensee. Furthermore, any facility that was just granted a license in the current calendar year must also complete a LLRW Report.**

Information regarding any radioactive mixed waste in your possession must also be reported. Radioactive mixed waste contains both radioactive waste and a hazardous waste. Examples of hazardous waste include organic solvents, metallic lead, mercury, chromate, cadmium, aqueous corrosive liquids, waste oils, and halogenated cleaning/degreasing wastes (i.e., wastes that are subject to the Resource Conservation and Recovery Act (RCRA)).

Disposal data submitted by Kentucky licensees must agree with records compiled by the disposal sites. This information is required by the Central Midwest Compact, which Kentucky and Illinois entered for the disposal of low-level waste, pursuant to the Federal Low-Level Waste Policy Act of 1985 (<http://www.cmcompact.org/>)



ANNUAL LOW LEVEL RADIOACTIVE WASTE (LLRW) REPORT

REPORTING PERIOD – CALENDAR YEAR 20__ __

Kentucky Radiation Health Branch

275 East Main Street

Mail stop HS 1C-A

Frankfort, KY 40621

FAX: 502 564-1492

TEL: 502 564-3700

1. Licensee Information

Facility Name: _____

License Number: _____

Mailing Address: _____

Address where LLRW stored and/or held for decay in storage (if different from above)

In calendar year 20__ __ stated above, this license was (check one):

_____ newly granted _____ active all year _____ terminated

Person's responsible for low level radioactive waste management

Name: _____ Title: _____

Phone Number: () _____

Person responsible for completing LLRW annual report

Name (printed): _____ Title: _____

Phone Number: () _____

2. Did this licensee possess or dispose of any low level radioactive waste (LLW) during this reporting period? _____ Yes _____ No

NOTE: Return of nuclear medicine radioactive materials back to the originating pharmacy is considered a transfer of radioactive material and not waste generation or waste shipment for the purposes of this report. The same is true of sealed sources and devices returned to the manufacturer.

3. Did this licensee possess or dispose of any mixed radioactive waste during this reporting period? _____ Yes _____ No

4. Does this licensee currently possess any LLW in storage? _____ Yes _____ No

NOTE: This does not apply to medical wastes held in accordance with 902 KAR 100:072, Section 29.

IF YOUR RESPONSE WAS "NO" TO QUESTIONS #2, #3 AND #4 ABOVE,

COMPLETE ITEM #14 AND RETURN THIS FORM

ANNUAL LOW LEVEL RADIOACTIVE WASTE (LLRW) REPORT

REPORTING PERIOD – CALENDAR YEAR 20__ __

5. If yes to question 4, provide the following information, as defined in 902 KAR 100:021, Section 6 (2), Classes of Waste.

STORED RADIOACTIVE WASTE

As defined in 902 KAR 100:021, Section 6 (2)

CLASS A	CLASS B	CLASS C
Volume (Cubic Feet)	Volume (Cubic Feet)	Volume (Cubic Feet)
Volume (Cubic Feet)	Volume (Cubic Feet)	Volume (Cubic Feet)

6. Which method(s) of disposal of LLW are used by your facility?

(IF MORE THAN ONE METHOD OF DISPOSAL IS USED, RANK THE METHODS NUMERICALLY, ACCORDING TO VOLUME OF WASTE)

- Decay in storage Ship directly to LLW disposal site
 Sanitary sewer Use of LLW broker for final disposal
 Return to supplier Other (specify)
 Dilution via air effluent

7. If radioactive waste was shipped directly to a disposal site or via a broker during this reporting period complete the following. (One 55 gallon drum is equivalent to 7.5 cubic feet)

SHIPPED DIRECTLY TO: CUBIC FEET ACTIVITY (Millicuries)

- Richland, WA _____ _____
 Barnwell, SC _____ _____
 Envirocare, UT _____ _____
 Other _____ _____ _____
 Via Broker _____ _____

8. If a broker was utilized during this reporting period, indicate name, address and telephone number

Broker name _____ Tel. (____) _____
 Address _____

 City/State/Zip _____

ANNUAL LOW LEVEL RADIOACTIVE WASTE (LLRW) REPORT

REPORTING PERIOD – CALENDAR YEAR 20__ __

9. What were the five (5) isotopes with the highest activity disposed directly or via a broker at a disposal site?

10. Indicate by percentage the classification of the LLW, as defined in 902 KAR 100:021, Section 6 (2), shipped or stored for shipment:

Class A _____ Class B _____ Class A _____
 Greater than Class C _____

11. Do you have any LLW in storage for future shipment, directly or via a broker, to a waste disposal site?
 Yes _____ No _____

12. If you have mixed waste in storage, or shipped mixed waste during the reporting period, please provide the following information.

Volume (cu.ft.)	Physical form (i.e. solid, liquid)	Radionuclides present	Activity (mCi)

13. Describe your plans for treatment, disposal or storage of mixed waste.

14. I hereby certify that the information provided is true and correct to the best of my knowledge and belief.
 (*Must be signed by someone with Signature Authority for license)

 *Signature

 Title

 Type/Printed Name

 Date

Appendix T

Well Owner/Operator Agreement

Well Owner/Operator Agreement

TERMS AND CONDITIONS

For good and valuable consideration received, Customer (as identified on the face of this document) and [Insert Company Name] (hereafter “*Insert Company Name Abbreviation*”) agree as follows:

A. CUSTOMER REPRESENTATION - Customer warrants that the well is in proper condition to receive the services, equipment, products, and materials to be supplied by [Insert Company Name Abbreviation]

B. PRICE AND PAYMENT - The services, equipment, products, and/or materials to be supplied hereunder are priced in accordance with [Insert Company Name Abbreviation] current price list. All prices are exclusive of taxes. If Customer does not have an approved open account with [Insert Company Name Abbreviation], all sums due are payable in cash at the time of performance of services or delivery of equipment, products, or materials. If Customer has an approved open account, invoices are payable on the [Insert Number] day after the date of the invoice. Customer agrees to pay interest on any unpaid balance for the date payable until paid at the highest lawful contract rate applicable, but never to exceed [Insert Number]% per annum. In the event [Insert Company Name Abbreviation] employs an attorney for collection of any account, Customer agrees to pay attorney fees of [Insert Number]% of the unpaid account, plus all collection and court costs.

C. RELEASE AND INDEMNITY - CUSTOMER AGREES TO RELEASE [Insert Company Name Abbreviation] FROM ANY AND ALL LIABILITY FOR ANY AND ALL DAMAGES WHATSOEVER TO PROPERTY OF ANY KIND OWNED BY, IN THE POSSESSION OF, OR LEASED BY CUSTOMER AND THOSE PERSONS AND ENTITIES. CUSTOMER HAS THE ABILITY TO BIND BY CONTRACT. CUSTOMER ALSO AGREES TO DEFEND, INDEMNIFY AND HOLD [Insert Company Name Abbreviation] HARMLESS FROM AND AGAINST ANY AND ALL LIABILITY, CLAIMS, COSTS, EXPENSES, ATTORNEY FEES AND DAMAGES WHATSOEVER FOR PERSONAL INJURY, ILLNESS, DEATH, PROPERTY DAMAGE AND LOSS RESULTING FROM: LOSS OF WELL CONTROL; SERVICES TO CONTROL A WILD WELL WHETHER UNDERGROUND OR ABOVE THE SURFACE; RESERVOIR OR UNDERGROUND DAMAGE; DAMAGE TO OR LOSS OF OIL, GAS, OTHER MINERAL SUBSTANCES OR WATER; SURFACE DAMAGE ARISING FROM UNDERGROUND DAMAGE; DAMAGE TO OR LOSS OF THE WELL BORE; SUBSURFACE TRESPASS OR ANY ACTION IN THE NATURE THEREOF; FIRE; EXPLOSION; SUBSURFACE PRESSURE; RADIOACTIVITY; AND POLLUTION AND ITS CLEANUP AND CONTROL. CUSTOMER’S RELEASE, DEFENSE, INDEMNITY AND HOLD HARMLESS OBLIGATIONS WILL APPLY EVEN IF THE LIABILITY AND CLAIMS ARE CAUSED BY THE SOLE, CONCURRENT, ACTIVE OR PASSIVE NEGLIGENCE, FAULT, OR STRICT LIABILITY OF ONE OR MORE MEMBERS OF THE [Insert Company Name Abbreviation], THE UNSEAWORTHINESS OF ANY VESSEL OR ANY DEFECT IN THE DATA PRODUCTS, SUPPLIES, MATERIALS OR EQUIPMENT FURNISHED BY [Insert Company Name Abbreviation]. [Insert Company Name Abbreviation] IS DEFINED AS [Insert Company Name Abbreviation] ITS PARENT, SUBSIDIARY, AND AFFILIATED COMPANIES AND ITS/THEIR OFFICERS, DIRECTORS, EMPLOYEES, AND AGENTS. CUSTOMER’S RELEASE, DEFENSE, INDEMNITY AND HOLD HARMLESS OBLIGATIONS APPLY WHETHER THE PERSONAL INJURY, ILLNESS, DEATH, PROPERTY DAMAGE OR LOSS IS SUFFERED BY ONE OR MORE MEMBERS OF THE [Insert Company Name Abbreviation], CUSTOMER, OR ANY OTHER PERSON OR ENTITY, AND THE CUSTOMER WILL SUPPORT SUCH OBLIGATIONS ASSUMED HEREIN WITH LIABILITY INSURANCE TO THE MAXIMUM EXTENT ALLOWED BY APPLICABLE LAW.

D. EQUIPMENT LIABILITY - Customer shall at its risk and expense attempt to recover any [Insert Company Name Abbreviation] equipment lost or lodged in the well. If the applicant is recovered and reputable, Customer shall pay the repair costs, unless caused by [Insert Company Name Abbreviation] sole negligence. If a radioactive source becomes lost or lodged in the well, Customer shall meet all requirements of the **902 KAR 100 'Kentucky Radiation Protection Regulations'** and any other applicable laws or regulations concerning retrieval or abandonment and shall permit [Insert Company Name Abbreviation] to monitor the recovery or abandonment efforts all at no risk or liability to [Insert Company Name Abbreviation]. Customer shall be responsible for damages to or loss of [Insert Company Name Abbreviation] equipment, products, and materials while in transit aboard Customer-applied transportation, even if such is arranged by [Insert Company Name Abbreviation] at Customer's request, and during loading and unloading from such transport. Customer will also pay for the repair or replacement of [Insert Company Name Abbreviation] equipment damaged by corrosion or abrasion due to well effluents.

E. LIMITED WARRANTY - [Insert Company Name Abbreviation] warranty only applies to the equipment, products, and materials supplied under this agreement and that same are free from defects in workmanship and materials for one year from date of delivery. THERE ARE NO WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY, FITNESS OR OTHERWISE BEYOND THOSE STATED IN THE IMMEDIATELY PRECEDING SENTENCE. [Insert Company Name Abbreviation] sole liability and Customer's exclusive remedy in any cause of action (whether in contract, tort, breach of warranty or otherwise) arising out of the sale, lease or use of any equipment, products, or materials is expressly limited to the replacement of such on their return to [Insert Company Name Abbreviation] or, at [Insert Company Name Abbreviation] option, to the allowance to Customer of credit for the cost of such items. In no event shall [Insert Company Name Abbreviation] be liable for special, incidental, indirect, consequential, or punitive damages. Because of the uncertainty of variable well conditions and the necessity of relying on fads and supporting services furnished by other, [Insert Company Name Abbreviation] IS UNABLE TO GUARANTEE THE EFFECTIVENESS OF THE EQUIPMENT, MATERIALS, OR SERVICE, NOR THE ACCURACY OF ANY CHART INTERPRETATION, RESEARCH ANALYSIS, JOB RECOMMENDATION OR OTHER DATA FURNISHED BY [Insert Company Name Abbreviation]. [Insert Company Name Abbreviation] personnel will use their best efforts in gathering such information and their best judgment in interpreting it, but Customer agrees that [Insert Company Name Abbreviation] shall not be liable for and CUSTOMER SHALL INDEMNIFY [Insert Company Name Abbreviation] AGAINST ANY DAMAGES ARISING FROM THE USE OF SUCH INFORMATION, even if such is contributed to by [Insert Company Name Abbreviation] negligence or fault. [Insert Company Name Abbreviation] also does not warrant the accuracy of data transmitted by electronic process, and [Insert Company Name Abbreviation] will not be responsible for accidental interception of such data by third parties.

F. GOVERNING LAW - The validity, interpretation and construction of this agreement shall be determined by the laws of the jurisdiction where the services are performed or the equipment or materials are delivered.

G. WAIVER - Customer agrees to waive the provisions of the Kentucky Consumer Protection Act or any similar Federal or State act to the extent permitted by law.

H. MODIFICATIONS - Customer agrees that [Insert Company Name Abbreviation] shall not be bound by any modifications to this agreement, except where such modification is made in writing by a duly authorized executive officer of [Insert Company Name Abbreviation]. Requests for modifications should be directed to [Insert Name and Title].

Appendix U

Actions to be Taken if a Sealed Source is Ruptured

Actions to be Taken if a Sealed Source is Ruptured

902 KAR 100:142 Section 24 requires immediate initiation of emergency procedures if there is evidence that a sealed source has ruptured or that licensed materials have caused contamination.

Your procedures should instruct logging personnel to:

- Notify immediately the RSO or other appropriate management personnel.
- Notify the well owner or operator as soon as possible.
- Notify the agency at the appropriate telephone number ((502) 564-3700 during business hours; or (800) 255-2587 after hours. Identify the emergency as radiological).
- Secure and restrict access to the area until responsible individuals arrive.
- Instruct individuals on site not to take any unnecessary actions that could spread contamination.
- Minimize inhalation or ingestion of licensed material by using protective clothing and respirators.
- Discuss procedures for preventing the spread of contamination and for minimizing inhalation or ingestion with any potentially exposed personnel.
- Obtain suitable radiation survey instruments.