

**From:** Melanie Wong - NMSS  
**To:** Louis Carson - RIV  
**Date:** 10/22/02 2:15PM  
**Subject:** Re: CATX for RAM Tracers in Well-Logging Procedures

Hello Lou-

I spoke with Jim Lieberman of OGC. Although the Catex covers well-logging, it does not cover disposal offsite. He suggested that this may be a clearance issue (20.2002) that needs to be coordinated with NMSS. He asked me what is the specific regulation that covered disposal of the material?

I think rulemaking may have a copy of the risk assessment.

Melanie

>>> Louis Carson 10/22/02 12:11PM >>>

Hi Melanie:

With some additional NRC questions answered, I believe that the information below supports that the licensee's proposal fits into the CATX 10 CFR 51.22(c)(14)(xi) for well-logging.

In my assessment of whether the licensee's request for this "Alternate Disposal Method" requires an EA or not or whether it fall under the CATX provisions of 10 CFR 51.22(c)(14)(xi), I used the definition of CATX (10CFR51.14) plus pages 45, 48, and 49 of the Statement of Considerations (SOC) in 49FR9352. This FR is, also, provided in the NMSS Environmental Review & Associated Guidance training manual for the implementation of NUREG-1748 which given in RIV in 02/02.

(1) **CATX** : Defined as a category of actions which do not individually or cumulatively have a significant effect on the human environment and which the NRC has found to have no such effect in accordance with procedures set out in 10CFR51.22, and for which, **therefore, neither an EA nor an EIS is required.**

(2) I contend that the licensee's proposed action does not require a EA or a Technical Assistance Request (TAR) for RIV to proceed with this licensing action.

(3) In Proposed Category 14 of 49FR9352, based on a comment opposing the CATX of well-logging, the NRC ruled that they had carefully considered the comment but had concluded that in light of past regulatory experience and current licensing practices, that the environmental impact of licensing actions **[which included decommissioning efforts]** authorizing the use of sealed sources and radioactive tracer materials in well-logging procedures is negligible.

(4) In the SOCs for 10 CFR 51.22(c)(14)(xi), it states that the NRC prepared a risk analysis which showed that only a small radiological risk to the public health and safety from the potential release of radioactive material (RAM) due to long term corrosion or damage from drilling into abandoned sources. **(How can I find this risk assessment?)**

(5) Routine safety measures also protect against significant environmental impact from well-logging activities such as:

- Well drilling permits require that gas & oil wells be cased below potable water aquifers to prevent cross contamination.

- In the event that a RAM source becomes irretrievable during well-logging operations, safety requirements are imposed to minimize the escape of RAM from the source and surrounding areas.

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(5) Additional safety requirements include:

- Sealing the source in place with a cement plug.
- Setting a drill deflection device in place to prevent drilling into a RAM source.
- Mounting a permanent ID plaque at the surface of the well to notify anyone planning to enter the well of the existence of RAM.
- Notifications placed in pertinent land records that are maintained by the State oil & gas regulators.

(6) The construction of the RAM source to include the solubility of the compound, total radioactivity, and half-life provides protection.

**CC:** James Lieberman