

**From:** James Lieberman  
**To:** Anthony Huffert; Louis Carson  
**Date:** 10/23/02 8:48AM  
**Subject:** Fwd: Re: ACTION: CATX for RAM Tracers in Well-Logging Procedures

Tony

my concern was to make sure this was not a clearance type issue that nmss would be concerned with as it is another way to dispose of material

>>> Louis Carson 10/22/02 08:00PM >>>

Hi Tony:

(1) It's been awhile; I'm still here in Texas doing Uranium Recovery inspections and Materials Licensing.

(2) Jim Lieberman, OGC thought that I should get your perspective on this matter.

(3) I have a well-logging licensee who wants to dispose of well-logging sands with residual radioactivity (<1000 pCi/g and < 100 day half) down Class II EPA/State Permitted disposal wells; the States of Alaska and Texas have approved their requests (Yes, I reviewed them both). Considering the rigid controls on these wells by the States, and the licensee is willing to commit to the radiological controls that we place on them in the license, RIV would like to proceed with the licensing process. (Note: That the current license allows them dispose of the same material in earthen pits with controls.)

(4) Attached is an email that I have discussed with Jim Lieberman concerning a license amendment request (LAR) that was assigned to me this month. This LAR was sent to the NRC in **August 2000**. It was assigned to me, in part, because I did not believe that the licensee's request required a TAR to HQ or an EA. My belief is supported by what has been previously evaluated in the license for alternate disposal methods, and that this activity has been evaluated and Categorically Excluded per 10CFR51.22(c)(14)(xi) for well-logging and (c) 20.

Thx!  
Louis

**CC:** Jack Whitten

J/22