

Gallagher, Carol

Subject: FW: Docket ID NRC-2014-0119

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From: Jon Bakkedahl [mailto:jbakkedahl@health.nv.gov]
Sent: Wednesday, June 18, 2014 7:34 PM
To: Gallagher, Carol
Cc: Erickson, Randy; Tharakan, Binesh; Karen Beckley; Adrian C. Howe
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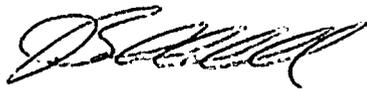
Ms. Gallagher,

I am writing regarding the NUREG 1556 Vol. 14 Rev. 1 in draft for comment. The sections regarding "frac-sand" was very limited and is a technology that has been around, but has recently expanded to several areas in the country in a large way. With limited guidance, we are relying on the companies themselves to teach and then explain how to inspect. I took the well logging course put on by the NRC and this was NOT part of the instruction. I have a few suggestions for the guidance:

1. List all of the current sources that are being used, there are several in use now but Ir-192 is the only one mentioned in the Draft;
2. Explain the "Zero Wash Proppant" terminology and technology;
3. List the normal activity for each source that is used;
4. Explain the use of the materials, and the blending in gel and sand;
5. Request the license to submit containment and decontamination surveys when there is a "sand out";
6. Request procedures for removing versus burring on site after "sand out";
7. Request emergency procedures for explosion, leak, contamination & if the lone user were to go down medically;
8. Request procedures for securing the area, "Radiography style" during use;
9. The sand trucks also possess a generally licensed device for flow measurement, this may need to be mentioned

Thank you for the opportunity for my comments, and if any explanation is required I am available to discuss.

Regards:



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dt. Herrera (TXH1)