



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

GLTS

April 20, 2017

TO: Users of Devices Subject to General License Registration

SUBJECT: ANNUAL REGISTRATION OF GENERALLY LICENSED DEVICES

The U.S. Nuclear Regulatory Commission (NRC) requires annual registration of certain devices that are possessed under the general license issued in Section 31.5 of Title 10 U.S. Code of Federal Regulations (10 CFR 31.5). Devices subject to registration include those containing the radioactive material and activity listed in Table 1 of the attached NRC Form 664. You are receiving this notice because NRC records indicate that you have one or more such devices. Information about the general license registration program is available NRC website at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>

Note that under 10 CFR 31.5(c)(11), the attached General Licensee Registration Package must be completed, signed, and returned to the NRC within 30 days from the date of this letter. Read all of the instructions prior to completing the package. Mail the completed package in the enclosed envelope to:

Director, Office of Nuclear Material Safety
and Safeguards
ATTN: GLTS
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Registration Fee: Commission regulations (10 CFR 170.31, Category 3Q) require that you submit a registration fee with each registration on an annual basis. The registration fee is subject to change yearly, and you are required to submit the fee that is in effect as of the date of this letter. An invoice for the current amount due will be sent to you under separate cover. If you have any questions about the fee or the invoice, please contact the License Fee Billing Help Desk at 301-415-7554 or e-mail at fees.resource@nrc.gov.

NRC amended 10 CFR Parts 170.11 and 170.31 to provide that 10 CFR Part 170 fees be assessed to Federal agencies, where applicable, in accordance with the Energy Policy Act of 2005. Therefore, those Federal facilities required to register certain generally licensed devices in their possession will be required to pay the annual registration fee.

Attachment: NRC Form 664 -- General Licensee Registration and Instructions

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Wagner", written over a horizontal line.

Katie Wagner
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and
Safeguards
Division of Material Safety, State, Tribal and
Rulemaking Programs
Material Safety Licensing Branch

**INSTRUCTIONS FOR COMPLETING NRC FORM 664
"GENERAL LICENSEE REGISTRATION"**

Review all six sections of this registration form. If any information is incorrect or missing, make corrections in the applicable boxes. If you have more devices than space provided in the form, **copy the form before starting, as needed.** Use black ink and print in **CAPITAL LETTERS.** Start information in the first box provided. If the information contains a number with a dash (-) or a decimal point (.), include the dash or decimal point as an individual character. Use the "ø" character to represent the number 0 (zero).

Verify information about the devices by reviewing the label on the outside of the device. **For safety reasons, DO NOT TRY TO TAKE APART any device to verify this information.** If you are uncertain how to identify the device's label, contact the device's manufacturer or an authorized service agent for this information. Also, contact the manufacturer for any additional information about NRC requirements. You may also review 10 CFR 31.5 and other applicable regulations on the NRC web site at <http://www.nrc.gov/reading-rm/doc-collections/cfr/>, or review specific information about the general licensee project at <http://www.nrc.gov/materials/miau/miau-reg-initiatives/gen-license.html>

Note to specific licensees: If you believe the device(s) listed on the registration form are possessed under your specific license, then verify the device label does not state the device is subject to a general license. If the labels indicate the device is subject to a general license, then complete the registration form as instructed below. If not, complete the registration as instructed below, however, in Section 2, follow the instructions for "not in possession of device" and complete one Section 4 page per device transferred to your specific license.

Section 1 - General Licensee Information. Provide the requested information about you, the general licensee.

On Page 1, provide the street address/location where your device(s) are used. For portable devices, provide the storage location. P.O. Box addresses are not allowed.

Do not write in the box marked **For NRC Use Only.**

On Page 2, provide the name, telephone number, and title of the individual responsible for your device(s), and a mailing address where correspondence about your device(s) can be sent. The mailing address should be specific to the physical location where the devices are used and/or stored (P.O. boxes may be used if this is the only available mailing address). The individual indicated in this section as responsible for your device(s) must also verify and sign the form in Section 5.

Section 2 - Devices Subject to Registration. This section lists each device subject to registration and in your possession, according to NRC records. Devices subject to registration include those containing at least one of the radionuclides listed in Table 1, with the activity indicated, at the time of manufacture.

Table 1. Criteria for Registration

Radionuclide	Activity greater than or equal to:
Strontium-90, Radium-226	3.7 megabecquerel (0.1 millicurie)
Cobalt-60, Curium-244, Americium-241, and Californium-252	37 megabecquerel (1 millicurie)
Cesium-137	370 megabecquerel (10 millicurie)

Use the codes from Table 2 when correcting isotope information for devices in this section. If you do not possess a device on this list, blacken the "not in possession of device" circle, and provide the relevant information in Section 4. Note that each device is assigned a unique six-digit number called the NRC Device Key.

Table 2. Isotope Codes for Sections 2 and 3

Radionuclide	Code for form	Radionuclide	Code for form
Americium-241	AM241	Curium-244	CM244
Californium-252	CF252	Strontium-90	SR90
Cesium-137	CS137	Radium-226	RA226
Cobalt-60	CO60		

Section 3 - Additional Devices. If you have other generally licensed devices (not listed in Section 2) that meet the conditions for registration listed in Table 1, provide information about each additional device. **Before starting, copy this section as needed for your additional devices.** Also indicate how you acquired each device by blackening the proper circle.

When entering isotope and unit information for your device(s), use the codes listed in Table 2 of Section 2 for isotope information, and use the codes from Table 3 for unit information:

Table 3. Unit Codes for Section 3

Unit	Code for form	Unit	Code for form
picocurie	PCI	becquerel	BQ
nanocurie	NCI	kilobecquerel	KBQ
microcurie	UCI	megabecquerel	MBQ
millicurie	MCI	gigabecquerel	GBQ
curie	CI	terabecquerel	TBQ
pound	LB	microgram	UG
		milligram	MG
kilogram	KG	gram	G

Section 4 - Not in Possession of Device. Use this section to report any devices that are listed in Sections 2 or 6, but that you no longer possess. **Before starting, copy this section as needed for additional devices that are not in your possession.** Enter the NRC Device Key, as listed in Section 2 or 6. Blacken the circle (choose only one) that best describes the disposition of the device and complete the rest of the section as appropriate.

Section 5 - Certification and Signature. The responsible individual must certify, sign, and date Section 5.

Section 6 - Devices Not Subject to Registration. This list contains information about devices that NRC records indicate are in your possession, but **are not subject to registration.** If you no longer have one or more of the listed devices, you are required to make a transfer report to NRC in accordance with 10 CFR 31.5(c)(8) or (9), as applicable. You may use Section 4 for this purpose. This section does not list any static eliminators containing polonium-210 (Po-210), or luminous exit signs containing tritium (H-3). These devices are not subject to registration, and are not included in this section in an effort to reduce the length of this form.

RETURN THE COMPLETED FORM IN THE ENCLOSED ENVELOPE WITH PROPER POSTAGE.



GL-724384-21

SECTION 4 - NOT IN POSSESSION OF DEVICE

SECTION 4

04/11/2017

PAGE 1 of 1

Provide information about devices listed in Section 2 or 6, but no longer in your possession.

Part 1

Transfer Date:

NRC Device Key: 8 0 2 3 6 3

Transfer Date grid

Location of the Device: Refer to attached e-mail dated 12/16/16 to C. Valentin-Rodriguez

- Whereabouts Unknown (complete Part 1 only)
Transferred to another general licensee (complete Parts 2 and 3)
Never Possessed the Device (complete Part 1 only)
Transferred to a Specific Licensee (Not the manufacturer)
Returned to Manufacturer (complete Part 1 only)
(complete Part 2)

Part 2 License Number of Recipient (if transferred to a specific licensee):

License Number grid

Company Name:

Company Name grid

Department:

Department grid

Address Line 1:

Address Line 1 grid

Address Line 2:

Address Line 2 grid

City:

City grid

State:

State grid

Zip Code:

Zip Code grid

Part 3

Enter the name of the individual responsible for this device:

Last Name:

Last Name grid

First Name:

First Name grid

Middle Initial:

Middle Initial grid

Telephone Number:

Telephone Number grid

Extension:

Extension grid

Title:

Title grid



Hobbs Marcia

From: Hobbs Marcia
Sent: Friday, December 16, 2016 1:36 PM
To: 'Valentin-Rodriguez, Celimar'
Subject: RE: RE: GL-724384 Kansas City Power and Light Company

Good Afternoon Celimar,

KCP&L's Iatan Station (Iatan) had previously notified the NRC that it is no longer in possession of a portable lead paint analyzer (device) transferred to KCP&L in 2009. We have continued our attempts to locate the device, but, to date, we have not been able to find it. Our search measures included the following:

- Contacting the device's distributor, Protec Instrument Corporation (Protec), formerly Dynasil/RMD Instruments Corporation, via phone. Protec informed KCP&L that the item was purchased and transferred to KCP&L in October 2009. However, Protec does not have a record of the device being transferred back to them from KCP&L.
- Conducting additional searches of Iatan and several other KCP&L locations.
- Interviewing employees believed knowledgeable of the history of device's procurement and storage. These interviews included current Iatan employees as well as individuals who have since relocated to other KCP&L facilities or retired from KCP&L.

The Iatan Station currently has nineteen (19) source devices, all of which are included in our annual General Licensee Registration submitted to the NRC as either registered devices or devices not subject to registration. All of the source devices at the facility are fixed devices utilized as level gauges. KCP&L no longer utilizes or possesses portable radioactive source devices at Iatan or at any other facility.

All of the current fixed devices are managed under the facility's formal Radiation Safety Program (RSP). A qualified Radiation Safety Officer implements the RSP, and, although the gauges are subject to protocols for General Licensees, the Specific Licensee protocols are utilized by the facility as a guideline. Pursuant to the facility's RSP, the following measures are in place at Iatan:

- Performs annual review of the RSP
- Commissions periodic third-party audits of the RSP
- Conducts semi-annual physical inventories and shutter checks of all of the devices
- Conducts routine radiation surveys according to documented instructions
- Utilizes radiation monitoring instruments that are calibrated annually
- Conducts routine cleaning and maintenance of gauges according to manufacturer's recommendations
- Performs routine maintenance pursuant to written lockout/tagout procedures
- Established and implemented operating and emergency procedures
- Provides routine radiation safety training to employees

Thank you,

Marcia Hobbs

Environmental Compliance Administrator | KCP&L Iatan Generating Station | 20250 Hwy 45 N. | Weston, MO 64098 | 816-640-3892



GL-724384-21
04/11/2017

SECTION 5 - CERTIFICATION

SECTION 5
PAGE 1 of 1

I hereby certify that:

- A. All information contained in this registration is true and complete to the best of my knowledge and belief.
- B. A physical inventory of the devices subject to registration has been completed, and the device information on this form has been checked against the device labeling.
- C. I am aware of the requirements of the general license, provided in 10 CFR 31.5.

(Copies of applicable regulations may be viewed at the NRC website at:
<http://www.nrc.gov/reading-rm/doc-collections/cfr>)

Marcella Boles

4-28-17

SIGNATURE - RESPONSIBLE INDIVIDUAL (Listed in Section 1)

DATE

WARNING: FALSE STATEMENTS MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL ASPECTS. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY WRONG STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER IN ITS JURISDICTION.





GL-724384-21
04/11/2017

SECTION 6 - DEVICES NOT SUBJECT TO REGISTRATION

SECTION 6

PAGE 3 of 3

NRC Device Key: 802363

Manufacturer License No: MA 53-0271

Manufacturer Name: RMD INSTRUMENTS CORPORATION

Model Number: LPA-1

Serial #: 3249

Transfer Date: 10/27/2009

Isotope: CO57

Activity: 15.000000000

Unit: mCi
