

From: Kudarauskas, Paul
To: [Ullrich, Elizabeth](#); [Cardarelli, John](#)
Subject: [External_Sender] RE: Change in the EPA NRC License Authorization Condition 10
Date: Monday, January 08, 2018 2:07:27 PM
Attachments: [image001.png](#)

Betsy,

Great news. Thank you for the quick find and fix. We greatly appreciate it!

R/Paul

Paul G. Kudarauskas, "Kuda"
Chief, Field Operations Branch
CBRN Consequence Management Advisory Division
Office of Emergency Management
United States Environmental Protection Agency
Mobile: [202-344-5382](tel:202-344-5382) Office: [202-564-2415](tel:202-564-2415)

From: Ullrich, Elizabeth [<mailto:Elizabeth.Ullrich@nrc.gov>]
Sent: Monday, January 08, 2018 1:30 PM
To: Cardarelli, John <Cardarelli.John@epa.gov>
Cc: Kudarauskas, Paul <Kudarauskas.Paul@epa.gov>
Subject: RE: Change in the EPA NRC License Authorization Condition 10

My apologies. Your license was converted over to the new format, and it requires more editing on my part. I missed removing the section of temporary job site locations that is applicable to non-federal licensees. We used to have 2 separate conditions for the two situations; now we have one and it has to be edited for federal.

I will get a Corrected Copy issued.

Betsy

From: Cardarelli, John [<mailto:Cardarelli.John@epa.gov>]
Sent: Monday, January 08, 2018 10:57 AM
To: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>
Cc: Kudarauskas, Paul <Kudarauskas.Paul@epa.gov>; Courtemanche, Steven <Steven.Courtemanche@nrc.gov>
Subject: [External_Sender] Change in the EPA NRC License Authorization Condition 10

Docket: 030-38700

License Number: 16-3511-01

Hi Betsy,

I left you a voice mail but wanted to follow up with an email. First, I want to thank you for your time

and patience with us as we continue to grow our program through its fourth license amendment. I just received our latest license version and noticed a significant change in Condition 10. Previous versions stated:

“Licensed material may be used or stored only at the licensee’s facilities located at 4900 Olympic Boulevard, Erlanger, Kentucky, and at temporary job sites of the licensee anywhere in the United States.”

The latest version states:

“Licensed material may be used at temporary job sites anywhere in the United States where the U.S. Nuclear Regulatory Commission maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States. If the jurisdiction status of a Federal facility within an Agreement State is unknown, the licensee should contact the Federal agency controlling the job site in question to determine whether the proposed job site is an area of exclusive Federal jurisdiction. Authorization for use of radioactive materials at job sites in Agreement States no under exclusive Federal jurisdiction shall be obtained from the appropriate state regulatory agency.”

I’m hoping this is a small oversight because this new condition severely impacts our program. We had not requested a change in our deployability of these sources but it appears that new conditions exist in Amendment #4. I would like to discuss options with you to return back to our original authorization language at your earliest convenience. I have source deployments scheduled for Florida and Alaska in the next 8 weeks and this new condition could adversely impact those plans.

I’m on TDY this week to Dallas, so I can be reached on my cell at 513-675-4745. Looking forward to our discussion.

Sincerely,

John Cardarelli II
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