

From: [Cook, Jackie](#)
To: [David Lawrenz \[KDHE\]](#)
Cc: [AgreementStateRegs Resource](#)
Subject: RE: RE: nonstandard license condition for Kansas
Date: Friday, November 19, 2021 2:43:37 PM

Thank you so much for your response, David. Michelle is Cc'd on your response. If she has additional questions or need for additional information, she will reach out to you.

Thank you in advance for your understanding in this matter.

Sincerely,

Ms. Jacqueline "Jackie" D. Cook
Regional State Agreements Officer
US Nuclear Regulatory Commission Region IV
Division of Nuclear Materials Safety
1600 East Lamar Blvd., Arlington, TX 76011
817-200-1132 (office)/817-371-7908 (cell)
Email address: Jackie.Cook@nrc.gov

From: David Lawrenz [KDHE] <David.Lawrenz@ks.gov>
Sent: Friday, November 19, 2021 11:25 AM
To: Cook, Jackie <Jackie.Cook@nrc.gov>
Cc: AgreementStateRegs Resource <AgreementStateRegs.Resource@nrc.gov>
Subject: [External_Sender] RE: nonstandard license condition for Kansas

I am unsure what specifically to include and my time has been consumed with the conversion to WBL.

The purpose of the proposed license condition is to allow the storage cavern owner to continue to use the storage cavern even though a source is in it. It is not an active well, there is no drilling or other intrusions into it due to the fact it is a storage cavern and those activities would jeopardizing the integrity of the structure. The cavern has multiple access points for access to the stored gas and it doesn't pose a risk to the public allowing the cavern to remain operational but the loss of storage capacity does pose a very significant impact to the owner of the storage field.

The first license condition is to allow the cavern to remain in use and stipulate that the owner submits annual monitor reports to KDHE to show the device is not moving in the cavern, after 3 years of reports KDHE could approve a monitoring frequency at a greater interval (with the understanding these caverns are very stable which is why they can be used for gas storage). The second and third conditions require the licensee to submit reports if there is a change in location of the source or loss of integrity of the cavern and adds a reporting requirement to the licensee in addition to other reporting requirements.

Thanks

David

From: Cook, Jackie <Jackie.Cook@nrc.gov>
Sent: Friday, November 19, 2021 10:20 AM
To: David Lawrenz [KDHE] <David.Lawrenz@ks.gov>
Cc: AgreementStateRegs Resource <AgreementStateRegs.Resource@nrc.gov>
Subject: RE: nonstandard license condition for Kansas

EXTERNAL: This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Good Morning David, no rush but just checking the status of responding to Michelle Beardsley (Health Physicist, State Regulation Review Coordinator) as she requested below per your email.

Please note that we are not able to officially accept and review your non-standard license conditions until you respond to Michelle's request for information below.

Thank you in advance for your consideration in this matter.

Sincerely,

Ms. Jacqueline "Jackie" D. Cook
Regional State Agreements Officer
US Nuclear Regulatory Commission Region IV
Division of Nuclear Materials Safety
1600 East Lamar Blvd., Arlington, TX 76011
817-200-1132 (office)/817-371-7908 (cell)
Email address: Jackie.Cook@nrc.gov

From: AgreementStateRegs Resource <AgreementStateRegs.Resource@nrc.gov>
Sent: Thursday, November 04, 2021 7:27 AM
To: David Lawrenz [KDHE] <David.Lawrenz@ks.gov>
Cc: Cook, Jackie <Jackie.Cook@nrc.gov>
Subject: FW: nonstandard license condition for Kansas

Good morning David, I received your request below to submit this for a compatibility review. Before I officially accept it for review I will need for you to provide the following:

1. Indicate what regulations, guidance, or other standard(s) these are based on.

Please feel free to contact me directly with any questions. As soon as I receive this information, I will accept the submission for review.

Thank you for your assistance in this matter.

-Michelle

Michelle Beardsley, Health Physicist
State Regulation Review Coordinator

State Agreement and Liaison Programs Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
301-415-0275
michelle.beardsley@nrc.gov



From: Cook, Jackie <Jackie.Cook@nrc.gov>
Sent: Wednesday, November 03, 2021 11:36 AM
To: AgreementStateRegs Resource <AgreementStateRegs.Resource@nrc.gov>
Cc: David Lawrenz [KDHE] <David.Lawrenz@ks.gov>
Subject: FW: nonstandard license condition for Kansas

Good Morning, please see the email from the State of Kansas below requesting approval to add 3 non-standard license conditions to their well logging licensees with Sc-46 authorization on the license.

In addition, please contact David if additional information or clarification is needed.

Thank you in advance for your consideration in this matter.

Jackie

Ms. Jacqueline "Jackie" D. Cook
Regional State Agreements Officer
US Nuclear Regulatory Commission Region IV
Division of Nuclear Materials Safety
1600 East Lamar Blvd., Arlington, TX 76011
817-200-1132 (office)/817-371-7908 (cell)
Email address: Jackie.Cook@nrc.gov

From: David Lawrenz [KDHE] <David.Lawrenz@ks.gov>
Sent: Wednesday, November 03, 2021 10:27 AM
To: Cook, Jackie <Jackie.Cook@nrc.gov>

Subject: [External_Sender] nonstandard license condition for Kansas

These are the three license conditions we are adding to a license. This is regards to a well logging source of 300mCi of Scandium 46. This will not be a long term license due to decay and depths the source is at, but they lost it down a storage cavern that they do not want to seal. The nature of underground storage caves are such that there will be no drilling or other work that could compromise the device. Also geologically it is not in communication with any water, it is a salt cavern and is fully isolated from any subsurface water.

Can these be submitted to the Regulations Manager for review?

The licensee shall file a report with the department within fifteen (15) days of monitoring required by this condition describing the equipment involved, the test result and any action taken for each of the following:

- A. Annually thereafter for a period of three (3) years.
- B. After completion of Item A of this condition, the monitoring period may be extended to each five (5) years with approval of the department.

The licensee shall notify the department within twenty-four (24) hours of monitoring required by Condition 13 describing the equipment involved, the test result and any action taken if the monitoring indicates either of the following:

- A. The actual or potential dislocation of the source, or
- B. The actual or potential loss of integrity of the cavern.

The licensee shall notify the department five (5) days in advance of any operations which will or have the potential of altering the conditions in which the source described in Items 6A, 7A, 8A & 9A is encased.

(items 6,7,8,9 are the material that is in the cavern)

David Lawrenz
Supervisor
Kansas Radioactive Materials Team