Texas Department of State Health Services
Radiation Safety Licensing Branch

Regulatory Guide 2.10

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Guide for the Preparation of Radioactive Material License Applications for Well Logging and Tracer Studies

I. INTRODUCTION

A. Licensing Process

The acquisition, possession, use, manufacture, production, transport, transfer, and processing of radioactive material in Texas, shall be authorized by the Texas Department of State Health Services (DSHS), Radiation Safety Licensing Branch. The branch issues such authorization as a license. A license indicates what type, quantity, form, and use of radioactive material is authorized and any special conditions under which the radioactive material shall be used. This guide describes the process for application for a specific license and for amendment, renewal, and termination of a license.

B. DSHS Contacts

The DSHS radiation control program maintains an Internet site. The site contains the rules and forms referenced in this regulatory guide, as well as information on who to contact at DSHS with questions, information on the activities and structure of the department, topics of interest about radiation, and links to other radiation-related web sites.

The DSHS Internet site is located at: http://www.dshs.state.tx.us/radiation

If you do not have access to the world-wide web and need additional information, please call (512) 834-6688 and ask for the following:

Industrial Licensing Program - questions regarding the regulation of Well Logging and Tracer operations and the application for radioactive material license and any related correspondence.

II. APPLICABLE REGULATIONS

A. The requirements of the following sections of Title 25, Texas Administrative Code (TAC), Chapter 289, apply to the use of radioactive material in Well Logging and Tracer operations:

§289.201 "General Provisions for Radioactive Material"

§289.202 "Standards for Protection against Radiation from Radioactive Material"

§289.203 "Notices, Instructions, and Reports to Workers; Inspections"

§289.204 "Fees for Certificates of Registration, Radioactive Material Licenses, Emergency Planning and Implementation, and Other Regulatory Services"

§289.205 "Hearing and Enforcement Procedures"

§289.251 "Exemptions, General Licenses, and General License Acknowledgements"

§289.252 "Licensing of Radioactive Material"

§289.253 "Radiation safety Requirements for Well Logging Service Operations and Tracer Studies"

§289.257 "Packaging and Transportation of Radioactive Material"

B. It is the licensee's responsibility to ensure that its facility and any additional authorized sites are provided with copies of the applicable rules. These rules may be downloaded from the DSHS Internet site http://www.dshs.state.tx.us/radiation. If you do not have access to the world-wide web you may request one copy of the applicable rules. For a charge, you may request rules on disk or more than one hard copy of the rules.

III. FILING AN APPLICATION

A. GENERAL

25 TAC, Chapter 289, this guide, forms, and other guidance documents are available on the DSHS Internet site: http://www.dshs.state.tx.us/radiation. Each applicant must submit the following forms in duplicate:

- **RC Form 252-1 (Business Information Form)**

  Applicants must sign and submit, in duplicate, a completed Business Information Form, including a certification statement of financial qualification to conduct the requested activity, including any decontamination, decommissioning, reclamation and disposal [25 TAC §289.252(jj)(8)].

- **RC Form 252-2 (Application for Radioactive Materials License)**

  Space provided on the application form is limited, so 8.5" x 11" paper should be used to append additional pages. Each page submitted with the application should be identified and keyed to the item number on RC Form 252-2 to which it applies. Two copies of the application and all attachments must be submitted, with another copy retained by the applicant. All application items must be addressed in sufficient detail to demonstrate that equipment, facilities, personnel qualifications and procedures are adequate to protect public health and safety or property.

III. FILING AN APPLICATION (continued)

B. LICENSE FEES

- **New Application**

A fee must be submitted with each new application. Refer to 25 TAC §289.204 to determine the fee that should accompany the application. Each additional storage site will add 25% to the base license application fee. You may contact the accounting office at (512) 834-6688 to verify the total application fee required. Review of the application will not begin until the proper fee is received by the DSHS. The check or money order should be made payable to the Department of State Health Services.

Mail the completed new license application and the required application fee to:

Texas Department of State Health Services
Radioactive Material Licensing – *MC 2003*
P.O. Box 149347
Austin, Texas 78714-9347

- **Biannual Fee**

Once a license has been issued, a nonrefundable fee must be paid biannually for each radioactive material license. The fee must be paid in full for 2 years on or before the last day of the expiration month of the license. For example, if the license expires September 30, 2009, the biannual fees are due on or before September 30 of each odd-numbered calendar year. You will receive a bill from the DSHS for your biannual fee approximately 60 days prior to the fee due date.

Electronic payments of annual fees are accepted and may be made with an electronic check via Texas Online, http://texasonline.com, or mailed using the payment coupon and envelope included with the bill.

- **License Renewal or Amendment**

Do not submit a fee with the request for renewal or amendment. If an amendment changes or adds a category of license or adds an additional authorized use site, the biannual fee will be adjusted accordingly. The adjustments will be reflected on your next fee bill.

The department maintains a separate address for regular correspondence. Submit your license renewal or amendment request to the following address (no money accepted at this address):

Texas Department of State Health Services
Radioactive Material Licensing – *MC 2835*
P.O. Box 149347
Austin, Texas 78714-9347

C. COMPLETING THE APPLICATION

1. Submit RC Form 252-2, "Application for Radioactive Material License," for the use of Well Logging and Tracer operations.

III. FILING AN APPLICATION (continued)

2. Complete all items on the application in sufficient detail to allow the license reviewers to make a complete evaluation of the program for use of radioactive material in Well Logging and Tracer operations.
3. Submit two copies of the application and all attachments and keep a complete copy for your records.
4. Complete Items 1-15 on the application.
5. Additional sheets will be necessary to submit all of the information in items 8-15 of the application. Identify each separate sheet or document submitted with the application by referencing the application item number to which it refers.
6. Submit all documentation, including pages, sketches, and drawings, on 8-1/2 x 11 inch paper to ease handling and review. If larger drawings are necessary, they should be folded to 8-1/2 x 11 inches.

IV. CONTENTS OF AN APPLICATION

This section provides instructions on completing each item listed in RC Form 252-2, "Application for a Radioactive Materials License."

Item 1 – LEGAL BUSINESS NAME AND MAILING ADDRESS OF APPLICANT

List the name, a state of Texas mailing address, and telephone number of the individual or company to whom the license will be issued. If available, please include an e-mail address and fax number. Also complete and submit RC Form 252-1, "Business Information Form," available from the department's website.

An applicant corporation must be registered with the Texas Secretary of State's Corporations Section. If an assumed name is to be included, it will be identified as the name the applicant is doing business as (d/b/a) and must also be registered. For example, "ABC Corporation d/b/a ABC Enterprises of Texas." Business registration should be verified by contacting the Texas Secretary of State's Corporations Section at (512) 475-2755 or on the Internet at http://www.sos.state.tx.us/corp/sosda/index.shtml.

If the applicant is an individual, the individual should be acting in a private capacity, and the use of the radioactive material should not be connected with the individual's employment with a corporation or other legal entity.

Item 2 - LOCATIONS WHERE RADIOACTIVE MATERIAL WILL BE USED

Specify all use and/or storage locations by designating the street address, city, and state, or provide a descriptive address (e.g., 5 miles E of FM Road 14 on Texas Highway 10, Anytown, Texas). A post office box address is not acceptable in Item 2. Note: The number of authorized sites will affect the amount of license fee. Each additional storage and/or records location will add 25% to the base license fee. Also indicate whether well logging sources will be used at temporary jobsites throughout Texas.

IV. CONTENTS OF AN APPLICATION (continued)

Item 3 – THIS IS APPLICATION FOR

Identify if the application is for a new license or renewal of an existing license. If the application is for renewal of a license, provide the existing license number. If a previous license was or is currently held from Texas or another jurisdiction, include that information.

Item 4 - LOCATION WHERE RECORDS WILL BE KEPT

This is the location that will be listed on the license as the main site and the site to which all correspondence is mailed unless a post office box service is maintained. The main site is the site where the Radiation Safety Officer is routinely available and can receive correspondence without delay; and where copies of records for the entire license are maintained for inspection by the department (except for some sub-site utilization records). Provide the physical address of the site to be designated as the main site.

Item 5 - INDIVIDUAL USERS AND THEIR TITLES

List the names and titles of the individuals who will be using radioactive materials or the Radiation Safety Officer (RSO) may designate users if the users have received the training as indicated in Item 12.

Item 6 - RADIATION SAFETY OFFICER (RSO)

The RSO is the person designated to be responsible for the day-to-day radiation safety program. The RSO maintains all records required by department rules, and is the primary contact with the department on matters pertaining to the license and the use of radioactive materials. The RSO must have the authority to enforce radiation safety policy, suspend activities deemed unsafe, and require remedial action when necessary. Submit the following information concerning the RSO:

- The RSO's educational background and specific training and experience with radioactive materials in the field of radiation safety, and two years experience as a well logging supervisor, training per 25 TAC 289.253 (o)(1)
- Indicate the name of the RSO and telephone number(s), FAX number(s), and electronic mail address(es) where the RSO may be contacted.
- If multiple sites are requested, indicate the name(s) and qualifications (same as above) of the Site RSO and the telephone number(s) for each site.

After license issuance, if there is a change in RSO, request an amendment to the license as soon as possible. A listing of the duties and responsibilities of the RSO are given in 25 TAC §289.253(r). Include in your procedures the items which are applicable.

Item 7 – RADIOACTIVE MATERIALS DATA

7a. List by isotope, such as cesium-137 (Cs-137), americium-241 (Am-241), etc.

7b. Identify the manufacturer's name(s) and the model number(s) of the Sealed Sources.

7c. Indicate the maximum number of sealed sources of each isotope to be possessed. Include the activity for each sealed source and the total activity of each isotope to be possessed for each model device (number of devices).

7d. Describe the use of sources (e.g., logging oil and gas wells).

Licensees are encouraged to perform frequent inventory checks to guard against loss or theft.

IV. CONTENTS OF AN APPLICATION (continued)

Item 8 – FACILITIES

1. Describe the permanent storage facility for radioactive material, to include the following.

a. Provide a description of each facility where the radioactive material will be stored. The storage facility should be described by narrative, and drawings. In accordance with 25 TAC §289.253(f)(3). Sources of radiation shall be stored in one of only two approved methods; downhole or bunker. Further, in accordance with 25 TAC §289.253(f)(4) sources of radiation may not be stored at residential locations.

b. Describe the storage facility in relation to its surroundings. Indicate the location of neighboring businesses and/or residences in relation to your facility and show where the radioactive material will be stored in your facility. Indicate the specific distance the radioactive material will be located from occupied or residential areas. If applicable, include the position(s) of any work stations in the vicinity of the storage area.

c. Also, provide a detailed description of the radioactive material storage bunker or downhole storage. Indicate construction materials used in the storage area and dimensions of the facility, including wall thicknesses. Include a description of the location of warning signs 25 TAC §289.253(f)(2) around the storage area and indicate what security is provided to prevent unauthorized access to and/or use of the radioactive material. [25 TAC §289.253(f)(5)]

d. In addition to storage facilities, applicants who propose to use unsealed radioactive material must provide a description of the facilities used to decontaminate personnel and equipment. Facilities should be provided for the decontamination of equipment, clothing and personnel, as appropriate. Describe the facilities that will be provided and how contamination levels will be controlled and maintained to As Low As Reasonably Achievable (ALARA).

e. If the applicant proposes to launder contaminated clothing, a description must be provided of the laundry facilities showing the means of retaining wash water and where wash water will be released when analysis has determined that 25 TAC §289.202(ggg)(ii)release limits will not be exceeded.

f. Finally, please furnish this Agency with calculated exposure levels to employees and members of the public for the proposed storage areas based on the maximum loading of the storage bunker/pit. [25 TAC §289.253(aa)(1)]

g. Identify the owner of the proposed use and/or storage facility. If the facility is owned by another company, provide a letter from the owner or the owner's agent, acknowledging that they are aware that you are storing and/or using devices containing radioactive material on the property.

Item 9 – OPERATING SAFETY AND EMERGENCY PROCEDURES

The purpose of operating, safety, and emergency procedures is to provide personnel with clear and specific guidance and instructions for the use of radioactive material. The manual should include, but not be limited to the following topics:

1. Management Structure and Its Responsibilities - Provide a description of the management structure and the RSO's position in that structure. Describe the applicant's position on radiation safety in relation to the work environment.

IV. CONTENTS OF AN APPLICATION (continued)

2. Radiation Safety Officer Duties - Explain the RSO's responsibilities and duties in the company, with emphasis on overseeing the radiation safety program. Describe records (i.e., administration, radiation surveys, periodic field inspections, etc.) that will be administered and maintained by the RSO. [25 TAC §289.253(r)(3)]

3. Individual Monitoring Devices (if necessary) - Individual personnel monitoring is required in accordance with 25 TAC §289.253(q). Individual monitoring devices shall meet the requirements of 25 TAC §289.202.

4. Posting of Areas and Containers - A description of storage area signs, temporary job site postings, device/tool labeling, and transport container labeling should be provided. Procedures should be written requiring that these signs and labels be checked at a specified interval. These procedures should also describe the type of information that is required on these signs and labels (e.g. 25 TAC §289.253(m)). Also, specify where items required by 25 TAC §289.203(b) will be posted.

5. Handling Procedures - Describe the procedures to be used when receiving and picking up radioactive material as required by 25 TAC §289.253(dd)(4)(L).

Describe the procedure for returning radioactive material to storage, initial entry of information on to a utilization log 25 TAC §289.253(k), using it in the field (to include identification and establishing of a restricted area and providing security of that area).

1. Describe procedures for handling sealed sources. [25 TAC §289.253(e) and 25 TAC §289.253(dd)(4)] These should include at least the following:

   a. Procedures for storing and transporting to well site. [25 TAC §289.253(f)(5), (h), (aa)(1) and 25 TAC §289.257]

   b. Procedures for loading logging tool, placing tool in well, removing tool from well and unloading source. If applicable, procedures should also be written addressing the storage, transport and use of logging tools which house a non-removable source of radiation. If your operations will be utilizing Measurement While Drilling (MWD) equipment, additional procedures should be written for shielding the source(s) during drill bit replacement. Explain your use of time, distance, and shielding during all phases of radioactive material handling.

   c. Radiation survey procedures from the time the source is removed from storage until it is returned to storage. [25 TAC §289.253(h)(1)]

   d. Procedures for the establishment and maintenance of the restricted area. [25 TAC §289.253(s)]

   e. Procedures for the required use of remote handling tools. [25 TAC §289.253(t)]

   f. Procedure for recording the survey of the logging tool, source shield. [25 TAC §289.253(aa)(3)]

2. Describe the procedures for handling tracer materials (if applicable). [25 TAC §289.253(d)] These should include at least the following:

   a. Procedures for storing and transporting to well site. [25 TAC §289.253(e)(5), (g), (aa)(1), (aa)(2) and §289.257]

IV. CONTENTS OF AN APPLICATION (continued)

b. Methods of using tracer materials and precautions taken to avoid injection into fresh water zones. [25 TAC §289.253(u)(2)]

c. Procedures for handling tracer material to avoid contamination including use of handling tools, special apparel worn, precautions taken to prevent inhalation of volatile materials such as Iodine, and use of time, distance and shielding during handling. [25 TAC §289.253(u)(1)]

d. Radiation survey procedures before, and after the operation and method of recording the final surveys, including vehicle surveys. [25 TAC §289.253(h)(2) and §289.253(aa)(5)]

e. Procedures to clean up spills, decontaminate personnel, decontaminate equipment, decontaminate clothing and shoes and to dispose of contaminated items. (i.e. pump trucks or proppant mixers).

f. Procedures for the collection and disposal of radioactive material (both solids and liquids) at the well site. This includes the "sandout" or reversal from a well (See Item 9 Part I below).

g. Include bioassay procedures if I-131 is used.

6. Transportation Procedures [25 TAC §289.253(e)] - These procedures may be included under Part 5 above. Describe how and where the source/material transport container is secured to the vehicle. Indicate how the vehicle will be placarded. Indicate what shipping papers are required and where they will be located in the vehicle. Describe when and how vehicle surveys will be performed and how and where they will be recorded.

For operations using unsealed radioactive material, provide procedures for transporting radioactive material; provide procedures for transporting radioactive material to and from the well site. These procedures should describe acceptable packaging and storage prior to transport. Procedures should also include methods of transporting radioactive waste and contaminated equipment (including clothing) back to the licensee's facilities.

7. Radiation Surveys - Discuss when and where physical radiation surveys must be performed. [25 TAC §289.202(p) and 25 TAC §289.253(aa)] Indicate how records of all surveys will be maintained. The applicant should also include a copy of all survey forms. These procedures should include a description of the meters and appropriate probes used in contamination surveys and wipe surveys, and should provide release limits. [25 TAC §289.202(eee)] This will require that the applicant determine if the instruments used have adequate sensitivity. In addition to the surveys required by 25 TAC §289.253(aa), surveys for restricted areas should include surveys for personnel leaving the restricted area, periodic (state the frequency) wipe surveys of all facilities in the restricted area, and equipment leaving the restricted area. Periodic (state the time period) surveys and wipe surveys of unrestricted areas (e.g. offices, personal vehicles, workers' homes) should also be performed.

1. Contamination Control – IF applying for use of tracer materials, formal procedures must be established for radioactive contamination. This should not just be for contamination at the well site, but also for personnel, equipment and the applicant's permanent facilities.

IV. CONTENTS OF AN APPLICATION (continued)

These procedures should discuss contamination limits for personnel, equipment and permanent facilities and the methods used to remove, reduce and prevent contamination from occurring.

Procedures for disposal or decay in storage of contaminated materials should be included.

8. Emergency Procedures - Discuss actions to be taken by the authorized user when emergency situations involving radioactive material occur. These situations could involve damage or rupture of a sealed source, vagrancy of a restricted area at a temporary job site by non- radiation workers, the theft of the source and/or material, the loss of a sealed source in the well bore, a vehicle accident, loss or damage to an employees' personnel monitoring device, over exposure, contamination of personnel, equipment, facilities, homes, vehicles, and ground surfaces. For all emergency procedures involving the potential for contamination, procedures should include actions to prevent the spread of contamination and minimize inhalation and ingestion of radioactive material. Include in all emergency procedures a discussion of the actions to be taken by the RSO when emergency situations occur. Formulate procedures for the notification of proper personnel in the event of an accident or well excursion. Include a listing of emergency telephone numbers of persons to be contacted in those situations.

In the event of a "sandout" or other type of reversal requiring that material be pumped out of the well bore, large quantities of material will be returned to the surface that contains radioactive material. This contaminated material must be removed from the environment - or, isolated in a manner that will reduce the concentration of each radionuclide in the material below the limits established in 25 TAC §289.202(ggg)(2)(F). If the applicant proposes to use unsealed radioactive material for subsurface operations, detailed procedures must be developed in the event of an uncontrolled release of radioactive material to the environment.

9. Recordkeeping - Provide a description of all records that will be maintained at field stations and at temporary job sites to document operations involving the use of radioactive material. Records should include, but not be limited to, all records mandated by 25 TAC §289.253(d)(3), (k), (y), (z) and maintained according to (bb)(5). Indicate where items required by 25 TAC §289.203(b)(1) will be posted.

Please provide a copy of the document which shall be signed by the well operator, well owner, drilling contractor, or land owner that specifies all the requirements found in 25 TAC §289.253(d)(3).

Include procedures for the logging supervisor to follow regarding obtaining the proper signatures prior to the beginning of well logging or tracer activities. Copies of completed agreements must be maintained by the licensee for a period of five years following completion of operations.

10. Equipment Maintenance and Inspection Procedures - Describe routine maintenance and inspections to be performed on the equipment. Indicate what items (at least, but not limited to, source holders, logging tools, injector tools, source handling tools, storage containers and transport containers) are to be checked and how the maintenance and/or inspection will be documented. Indicate what actions shall be taken if equipment is found to be out of

IV. CONTENTS OF AN APPLICATION (continued)

specifications. [25 TAC §289.253(n)(2)] Also, establish a specific interval for the maintenance and/or inspection to be performed. The quarterly inventory required by 25 TAC §289.253(i) will also be included here. Include samples of all forms used to document completion of maintenance and inspection functions.

Item 10 - RADIATION DETECTION INSTRUMENTATION

Provide the manufacturer name(s) and model number(s) for each type of survey meter to be used. If it is to be calibrated at the applicant's facility, a detailed description of how the instrument will be calibrated for all meter scales must be given. (Regulatory Guide 5.2, "Guide for the Preparation of Survey Instrument Calibration Applications," may be obtained from the Agency.) If the survey instrument is to be calibrated by a service firm, the firm should be one approved by the Agency.

Item 11 - LEAK TESTING

Sealed sources shall be leak tested every six months. Describe the method to be used for leak testing of sealed sources. If leak tests are to be analyzed by the applicant, a detailed description of the leak test procedures should be provided. (Regulatory Guide 5.1, "Guide for the Preparation of Leak Test Applications," may be obtained from the Agency.) If leak tests are to be analyzed by a leak test service firm, the firm should be one approved by the Agency. Records of leak tests must be maintained for a minimum of five years from the date of the leak test. [25 TAC §289.201(g) and (h)]

Item 12 - TRAINING AND EXPERIENCE

In the training program description include the sequence of events from the time of hiring through the designation of individuals as logging supervisors and logging assistants. Since 25 TAC §289.253(o)(1) and (2) have specific training requirements for logging assistants and logging supervisors, clearly differentiate between the training programs for logging supervisors and that for assistants. In addition, differentiate between the training, evaluation and examinations given to individuals with no previous training and experience and that given to individuals with previous training and experience.

Submit the following information and materials:

1. Orientation Training - Provide an outline of the initial orientation training and instruction to be given to prospective logging assistants. Provide a list of prerequisites of attendees. (e.g. high school diploma.)

2. 25 TAC §289.253(dd)(1) - Training of personnel in the topics covered in 25 TAC §289.253(dd)(1) must be performed by an Agency accepted course. Please provide the name of the company which shall provide this training for your personnel. If the applicant proposes to provide this training within the company, the following information must be provided:

a. Provide a detailed outline of each topic to be covered in the course. Be sure that, as a minimum, the topics listed in 25 TAC §289.253(dd)(1) are covered. Also, include the amount of time spent on each topic. This safety course requires at least 24 hours of classroom instruction, if only sealed sources are used. If unsealed radioactive material

IV. CONTENTS OF AN APPLICATION (continued)

use is proposed on the application, the course must be lengthened an additional 16 hours to cover topics normally associated with such use.

b. Identify the course segments by title and instructor.

c. Submit a description of each demonstration to be provided in the course.

d. If any equipment or visual aids are used, provide a description. These may include filmstrips, video tapes, movies, dummy sources, survey instruments, and handling equipment.

e. Provide a copy of any books, training manuals, and/or workbooks used in the course. If these books, training manuals, and/or workbooks are available commercially, you may provide the title, author(s), and publishing company.

3. Field Testing and Training - Provide a description of the field examination given to prospective logging supervisors and assistants. The examination should be given in the field and demonstrate the individual's knowledge and ability to perform logging activities and related tasks in compliance with the licensee's operating and emergency procedures and regulatory requirements.

4. Previously Trained Logging Supervisors and Assistants

a. Provide an outline of the instruction given to individuals with previous logging training.

b. Include a description of the examination they will be given.

5. On-the-job Training - In addition to the radiation safety training required above, describe on-the-job training provided to all users of radioactive material. This description should include the duration of the training, the person(s) providing the training and respective qualifications. Provide a commitment that on-the-job training will be for a minimum of 2 months full-time equivalent under the supervision of a fully qualified logging supervisor.

6. Periodic Training - Provide a discussion of periodic training, including the frequency of the training and by whom the periodic training will be conducted. Periodic refresher training should be conducted at least annually. The periodic training should provide a review of radiation safety principles, state regulations, the licensee's/registrant's procedures, company policies on radiation safety practices and a discussion of any new regulatory requirements. Records containing the names of the attendees, subject matter, instructor and date must be maintained for this training.

7. Instructor Qualifications

a. Identify the individuals who will instruct in the classroom or in the field, and the topics in which they will provide instruction.

b. Submit specific information about the experience and qualifications of these individuals. The person who instructs individuals in the classroom on the principles of radiation and radiation safety should have knowledge and understanding of the principles beyond that obtainable in a course similar to the one given to prospective logging supervisors.

c. Individuals providing instruction in the use of equipment must be qualified logging supervisors with experience in performing well logging and/or tracer studies.

IV. CONTENTS OF AN APPLICATION (continued)

Logging Supervisor

For an individual to be designated as a logging supervisor, the individual must meet the requirements of 25 TAC 289.253(o)(2).

Individuals with previous logging supervisor experience, still must receive training and testing from the current licensee who has the responsibility for determining that they have met the requirements and are competent to act as a logging supervisor.

Item 13 - WASTE DISPOSAL

The applicant must describe how the radioactive material will be disposed of when it is no longer needed or can no longer be used. Disposal of radioactive material shall satisfy the general requirements in 25 TAC §289.252(cc). Waste disposal can usually be accomplished by returning all sources to the manufacturer. Disposal options also include the original supplier, a commercial firm licensed by the NRC or an agreement state to accept radioactive waste from other persons, or another specific licensee authorized to possess the radioactive material. All records of receipt, transfer, and disposal as well as all survey records pertaining to these actions shall be retained indefinitely for DSHS inspection.

Item 14 - FINANCIAL QUALIFICATION AND FINANCIAL ASSURANCE

Refer to 25 TAC §289.252(gg) to determine if financial assurance must be provided. Unless license authorizations include large amounts of long-lived radioactive material (i.e., > 100 curies Am-241), financial assurance is not required and financial qualification can be established via self-attestation on RC Form 252-1, Business Information Form. To self-attest, complete all applicable areas on the form and mark the first box at the bottom of page 1.

Item 15 – CERTIFICATION

The application must be dated and signed by a representative of the corporation or legal entity who is authorized to sign official documents and to certify that the application contains information that is true and correct to the best of the applicant's knowledge and belief. All unsigned applications will be returned for proper signature.

Submit a completed RC Form 252-1 (Business Information Form) with the application.

Mail the completed application, all attachments and the new license application fee to:

Texas Department of State Health Services
Radioactive Material Licensing – *MC 2003*
P.O. Box 149347
Austin, Texas 78714-9347

V. LICENSE RENEWAL

Absent any actions by the department or the licensee, a license remains in effect for ten years. An application for license renewal must be received by the department. This filing will ensure that the license does not expire until final action on the application has been taken. Because of advances in radiation safety techniques, changes in operations during the term of the license and DSHS rule changes, a complete renewal application must be submitted like the original application. For personnel added since the license was issued, a statement must

V. LICENSE RENEWAL (continued)

confirm that the training and experience of new workers is in accordance with Item 12 of the application. If the application has made any changes in the training program, address those changes in Item 12 of the application.

DSHS should be contacted directly for assistance in answering questions concerning the renewal and the procedure for addressing specific items.

Submit a completed RC Form 252-1 (Business Information Form) with the application.

Mail the completed application and all attachments to:

Texas Department of State Health Services
Radioactive Material Licensing – *MC 2835*
P.O. Box 149347
Austin, Texas 78714-9347

VI. LICENSE AMENDMENT OR TERMINATION

A. AMENDMENT

1. Submit an amendment request by letter, rather than on an application form. Always reference your license number when corresponding with DSHS. Amendments submitted on an application form may cause a processing delay.
2. Specify exactly what you want changed on the license. Always furnish a justification for the request.
3. Plan ahead whenever possible. For instance, if you have placed a bid on a job and know that an amendment to the license will be required (i.e., new storage/use location, additional radioactive material, etc.), forward your request for amendment to DSHS immediately. **PLEASE DO NOT WAIT** until after you are awarded the contract to request an amendment.
4. Send your amendment request to the Industrial Licensing Program at the following address: Texas Department of State Health Services, Radioactive Material Licensing – MC 2835, P.O. Box 149347, Austin, Texas 78714-9347.
5. You will receive your license amendment by mail.
6. Always submit the request in duplicate, including attachments. For licensees with more than one permanent use/storage facility listed on the license or for amendment requests, you may be asked to submit more than two copies of your request. If you are asked to submit several additional copies of the request to the department, it would be advantageous to always submit that requested number of copies with future amendment requests.
7. Send routine amendment requests separately from amendment requests that are more complex. For example, if you are changing RSO and also need to release a permanent storage/use facility for unrestricted use, you should submit each request in separate letters. Many times DSHS will perform a confirming close-out survey of your facilities before they are authorized to be released for unrestricted use. This will cause a delay in processing the requested RSO change.

VI. LICENSE AMENDMENT OR TERMINATION (continued)

8. When requesting the relocation of a permanent storage/use facility, note that the new facility must be authorized on the license before relocation can occur. After the amendment is issued and you have relocated to your new facility it is important that you submit a request to terminate the former facility. This request should be accompanied by a close-out radiation survey [25 TAC §289.202(ccc)] or last leak tests record.

9. The department will accept most facsimile transmissions as a formal request for amendment. The fax number is (512) 834-6690. Please limit facsimiles to no more than ten pages, thus originals may **NOT** need to be sent regular mail.

B. TERMINATION

1. To terminate your license, the department requires the following.

a. Request should specify that you want to **terminate** the license.

b. Copies of surveys (or current leak tests) required by 25 TAC §289.202(p), if applicable.

c. All fees shall be paid/current. Not paying your biannual fee does **NOT** automatically terminate your license.

d. Documentation of radioactive material disposition and radiation surveys (or current leak tests) required by 25 TAC §289.252(l)(4)(C).

e. All Notices of Violation shall be resolved through the DSHS Policy/Standards/Quality Assurance's Radiation Group.

2. DSHS reserves the right to conduct a confirming radiation survey and facility evaluation prior to the release of controlled areas for unrestricted use. It is the licensee's responsibility to decontaminate facilities to levels allowing release for unrestricted use. If residual radiation levels or contamination levels exceed the applicable release limits contained in 25 TAC §289.202, your license will not be terminated until release limits have been met.

Mail the license amendment or termination requests and any attachments to:

Texas Department of State Health Services
Radioactive Material Licensing – *MC 2835*
P.O. Box 149347
Austin, Texas 78714-9347

You may also fax the license amendment or termination request to:

(512) 834-6690