



K A N S A S

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DEPARTMENT OF HEALTH AND ENVIRONMENT

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KANSAS INFORMATION NOTICE 04-02

REGISTRATION, USE, AND QUALITY  
ASSURANCE REQUIREMENTS FOR NRC  
CERTIFIED TRANSPORTATION  
PACKAGES

Addressees

All Kansas radiography and well log licensees.

Purpose

The State of Kansas is issuing this Information Notice (IN) to inform licensees of the attached NRC Information Notice 2004-13 which clarifies responsibilities regarding the packaging and transportation of licensed material, as delineated in 10 CFR Part 71.

Description of Circumstances

The State of Kansas has recently become aware of several instances of failure to register with NRC before first use of an NRC-approved transport package, as required by 10 CFR 71.12(c)(3), compatible Agreement State regulations, and 49 CFR 173.471(a) (note that, effective October 1, 2004, 10 CFR 71.12 is renumbered 10 CFR 71.17).

DIVISION OF ENVIRONMENT

Bureau of Air & Radiation

Radiation and Asbestos Control Section

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## Discussion

A recent audit of reciprocity forms (NRC Form 241) and 2003 NRC package registration data indicated that some licensees did not register as users with the NRC prior to using NRC-certified Type B packages. Specifically the audit found instances where certain NRC-certified Type B packages were listed on the reciprocity form, but the licensee had either not registered with the NRC, or the package was no longer authorized for transport. Most of these instances involved radiography licensees.

Individuals wishing to transport radioactive materials under the General License delineated in 10 CFR 71.12 or equivalent Agreement State rule must:

1. Have a valid NRC or Agreement State license to possess or use radioactive materials;
2. Have an NRC-approved Quality Assurance Program per 10 CFR 71, Subpart H; (see provisions of Section 71.101(g) for details on Radiography packages)
3. Have a copy of the packaging certification document, such as an NRC Certificate of Compliance, and the drawings and other documents referenced in the certification document;
4. Comply with all terms and conditions identified in the packaging certification document as well as Subparts A, G and H of 10 CFR 71; and
5. Register as a user for a given packaging with the NRC, in writing, prior to using the packaging for transport.

This Information Notice requires no specific action nor written response. If you have any questions about the information in this notice, contact this office or one of the technical contacts listed on the NRC Information Notice or the appropriate regional office.