



## **NSSI/SOURCES & SERVICES, INC.**

P.O. BOX 34042 HOUSTON, TEXAS 77234  
PH: (713) 641-0391 www.nssihouston.com FAX: (713) 641-6153

May 20, 2010

**Ms. Margaret Henderson  
Interim Executive Director  
TLLRWDC  
3616 Far West Blvd., Ste.117, #294  
Austin, TX 78731**

**TEL 512 820-2930**

**margaret.henderson@tllrwdcc.org**

**Dear Ms. Henderson:**

**Enclosed please find a "Petition To Export NORM/NARM Waste" to export NORM and/or NARM wastes for permanent disposal in the non-compact, commercial, U.S. Ecology facility located near Grandview, Idaho.**

**This Petition is being submitted as I am not certain whether export permission is required for NORM/NARM wastes shipped outside the Compact.**

**If no Petition is required, please advise and I will withdraw the Petition.**

**If a Petition is required and any additional information is needed to meet the petition requirements, please contact me and I will be happy to provide it.**

**The enclosed Petition is being transmitted to you by electronic mail and regular mail.**

**Sincerely,**

  
**Robert D. Gallagher  
President & RSO  
NSSI**

**RDG/vla  
Ref. #05201005.let  
rdg 052010a5**

# PETITION TO EXPORT NORM/NARM WASTE

1. Name of petitioner: Nuclear Sources and Services, Inc. (NSSI)

Mailing address: Box 34042, Houston, TX 77234

2. Person to be contacted concerning this petition:

Robert D. Gallagher Radiation Safety Officer  
713 641-0391 [rdgallagher@nssihouston.com](mailto:rdgallagher@nssihouston.com)

3. Proposed out-of Compact disposal facility:

NSSI treats NORM and NARM wastes and utilizes the land disposal site at:

U.S. Ecology  
Grand View, ID

4. Person or entity who generated the waste:

Name: Nuclear Sources & Services, Inc. (NSSI)

Mail address: Box 34042                      Physical address: 5711 Etheridge Street  
Houston, TX 77234                              Houston, TX 77087

Contact: Robert D. Gallagher Radiation Safety Officer  
713 641-0391 [rdgallagher@nssihouston.com](mailto:rdgallagher@nssihouston.com)

5. Effective period for which Petition is made:

June 1, 2010 to final and full opening of a Texas disposal site that can accept NORM and/or NARM wastes at levels that exceed the NORM and NARM waste acceptance criteria of the U.S. Ecology, Robstown, TX site. (This period is requested due to the uncertainties as to when a Texas site will be able to accept NORM and/or NARM waste activity levels generated at the NSSI facility wish exceed the Robstown acceptance levels.)

6. Total volume of NORM and/or NORM low-level radioactive waste projected to be exported during the time for which this petition is made, including the outermost container that will be used for disposal (in cubic units): 200-55 gallon drum equivalents (~1470 cubic feet) per year.

Since this petition request has an uncertain ending period, the projected volume has been estimated per year.

**7. Description of waste:**

**NORM and/or NARM solid wastes consisting of plastic, paper, metal, and glass from the handling of radioactive materials,**

**NORM and/or NARM solid wastes consisting of concrete and absorber materials from aqueous waste processing,**

**NORM and/or NARM solid wastes consisting of contaminated and activated metal, plastic, and glass containers.**

**NORM and/or NARM solid residues resulting from chemical and radioactive mixed waste treatment,**

**NORM and/or NARM solid wastes consisting construction debris and decontamination materials from facility and source decontamination.**

**NORM and/or NARM solid wastes and liquid wastes generated by oil field, refinery, and pipeline operations.**

**8. Reasons that the petition should be granted, including health and safety issues, emergency needs (if any), and the economic impact on the petitioner if the bexport petition is denied:**

**NSSI is the primary permitted radioactive and mixed waste treatment facility within the State of Texas and has provided radioactive waste treatment services since 1971.**

**NSSI is limited by its TCEQ permit R0-1811 to a limited number of drums of waste that can be stored at the NSSI site without posting additional financial security. When that volume is reached, NSSI can no longer accept radioactive waste for treatment and consolidation. While this significantly effects NSSI's profitability, it also limits the waste we can accept form other Texas generators.**

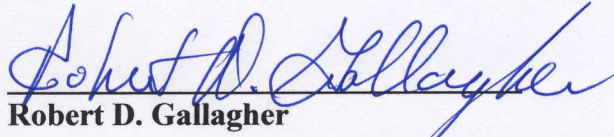
**While the U.S. Ecology site at Robstown, TX can accept NORM and/or NARM wastes, high specific activities and certain physical/chemical forms are not acceptable at the Robstown, TX site. The Idaho site accepts some NORM/Narm wastes that are not acceptable at Robstown.**

**9. Certifications:**

**I herby certify that the Petitioner is licensed (for radioactive material and waste) and/or permitted for (for hazardous and mixed waste), if applicable, and agrees to receive back the waste if its management or disposal is not allowed the proposed disposal facility.**

**I hereby certify that to the best of my knowledge, the information provided herein is accurate and correct and that the NORM/NARM waste for which this export petition is submitted will be packaged in accordance with applicable state and federal regulations and is acceptable at the intended disposal facility.**

**I hereby certify that I am authorized by my company, facility, or agency to commit it to each and every obligation and condition set forth herein.**

  
**Robert D. Gallagher**

**President and Radiological Safety Officer**

**May 20, 2010**

**Ref. #05201005.let**