

October 1, 12

Mrs Leigh Ing, Executive Director
Texas Low-Level Radioactive Waste Disposal Compact Commission
3616 Far West Blvd., Suite 117, #294
Austin, Texas 78731

Re: Import Petition

Dear Mrs. Ing:

Attached is an import petition seeking authorization to import certain amounts of Strontium-90 and Tritium to the Texas Compact radioactive waste disposal facility. This petition requests additional and supplemental disposal authorization.

In our initial import petition dated March 19, 2012, which was approved by the Commission on July 18, 2012, we requested authorization to import 15,188 Curies of radioactive waste consisting of mixed quantities of non-compactible trash. Unfortunately, the last three numbers quantifying the radioactivity were transposed in the application. The correct authorization sought should have been 15,881 Curies, as illustrated in the draft Agreement that was attached to the import petition.

We subsequently have disposed of 11,634 Curies of waste at the Texas Compact radioactive waste disposal facility and have a remaining allocation of 3,554.08 Curies on the approved import agreement. Going forward, we will need an allocation of 3,651 Curies to dispose of the remaining waste plus some additional waste in inventory. Thus, this request is to supplement our previous authorization and to request additional authority to dispose.

From a bookkeeping perspective, we felt it might be better to seek this new import agreement. So, upon approval of this petition, we request that our existing import agreement be terminated and replaced by this one.

If you have any questions, please contact me at 617-350-9306.

Sincerely,

Steve Humphrey
Director QA/EHS/Facilities

ANNEX A

TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL
COMPACT COMMISSION

APPLICATION FOR IMPORTATION OF NONPARTY LOW-LEVEL RADIOACTIVE WASTE

(NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS APPLICATION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL GENERATOR AS DEFINED IN 31 TAC §675.23(o), IN WHICH CASE THE APPLICATION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER)

1. Applicant Information:

Entity Name	<u>PerkinElmer Health Sciences, Inc.</u>
Contact Person	<u>Sunil Gulab</u>
Phone	<u>617-350-9432</u>
Email	<u>sunil.gulab@perkinelmer.com</u>
Website address	<u>www.perkinelmer.com</u>
Business Address	<u>549 Albany Street</u> <u>Boston, MA 02118</u>
Mailing Address	<u>Same</u>

Is Applicant: ☒ Generator

☐ A Broker who is a: ☐ Licensed Waste Processor

☐ Licensed Waste Collector

☐ Department of Defense

Notes:

(1) An appropriately licensed Broker may act on behalf of a Small Generator only if each such generator is identified and written authorization from each such generator is provided as an attachment hereto.

(2) While Department of Defense Regulation 4715.6-R designates the Department of the Army as Executive Agent for disposal of low-level radioactive waste, the Commission will require that any agreement that it enters into in this regard be signed by both the Department of the Army as Executive Agent and the branch of the military that has generated the waste.

Generator Type: ☐ Industrial
 ☐ Academic/Research
 ☒ Medical
 ☐ Utility
 ☐ Government

Is Applicant the entity responsible for the waste shipment? ☒ yes ☐ no

If no, please include the name and contact information for the entity responsible for the waste shipment.

Is Waste from a "Small Generator"? ☒ yes ☐ no

2. Term/Duration from Date of Approval: Two years

3. Waste proposed for importation.

Waste Volume (Cubic Feet) 96.0

Waste Radioactivity in Curies 3651

Place of origination (State) of waste: Massachusetts

Waste description: Laboratory trash, PPE, paper, plastic, glassware, and metal (NCTRASH)

H-3: 10.2 cubic feet containing 3600 Curies

Sr-90: 85.8 cubic feet containing 50.9 Curies

Waste classification (Class A, Class B, or Class C): Class B

Waste form: ☐ stable ☒ unstable

Does waste contain any of the following radionuclides, check box(es) and complete blank(s): No

☐ C-14 N/A millicuries (mCi)

☐ Tc-99 N/A microcuries (uCi)

☐ I-129 N/A nanocuries (nCi)

☐ Depleted Uranium N/A microcuries (uCi)

☐ Concentration N/A (provide units)

Source of generation

Sr-90 residues resulting from Y-90 extraction protocol

H-3 residues resulting from pharmaceutical operations

4. Is the proposed waste a sealed source?

☒ No. ☐ Yes. Please explain: _____

5. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) with the Texas Low-Level Radioactive Waste Disposal Compact Commission?

☒ No ☐ Yes. Please explain: _____

6. Does Broker and/or Generator(s) have any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) pending with any other regulatory agency with jurisdiction to regulate radioactive material including, without limitation, the Texas Commission on Environmental Quality (TCEQ)?

☒ No ☐ Yes. Please explain: _____

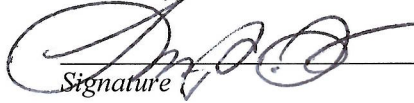
7. **Certifications.** Applicant hereby certifies the following.

- a. The information provided herein is complete, accurate and correct.
- b. The low-level radioactive waste for which this Application is submitted will be packaged and shipped in accordance with applicable state and federal regulations and is acceptable for disposal at the Compact Facility.

- c. The person submitting this Application is authorized by Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Nonparty Compact Waste. A copy of a written document containing such authorization must be attached to this Application.
- d. Applicant has delivered to the Compact Facility operator and TCEQ a copy of this Application and the Agreement for Importation of Nonparty Compact Waste (along with any supplements or amendment thereto).

8. **Authorized Signatory:**

Linda Lacy
Print or type name


Signature

Site Leader
Title

Oct. 1, 2012
Date

ATTACHMENTS:

(Attachments should include all applicable licenses, authorizations, and other materials needed or useful to fully explain the application.)



P.O. Box 817 — Kingston, TN 37763 — (865) 220-8501

December 19, 2012

Bob Wilson
TLLRWDCC
3616 Far West Blvd., Ste. 117, # 294
Austin, Texas 78731

Re: Perkin Elmer Import Application 1-0018-00

Dear Mr. Wilson,

Thank you to the Commissioners and your staff for assistance in the approval process for Importation of waste for Perkin Elmer. In an effort to clarify the questions raised during the Commission meeting on Friday November, 30 2012 and the actual amount of volume and activity needed to complete our waste shipments, we are submitting this letter and application.

Earlier this year PerkinElmer submitted Import Application 1-0006-00 and received approval to ship 378 cubic feet of waste with 15,188 curies of activity. In making the waste shipment additional wastes were discovered. Unsure of the proper process, Perkin Elmer submitted Import Application 1-0018-00 for consideration at the November meeting.

Perkin Elmer only needs an additional 96 Cubic feet and 100 Curies in order to ship their current waste inventory and have amended Import Application 1-0018-00 indicating these amounts. (See Attached)

The correct accounting of our needs for Importation is as follows:

Import agreement 2-0006-00 authorized by the Commission:	15,188 Curies	378 ft3
Waste disposed at WCS (according to WCS):	11,634 Curies	
Current remaining disposal authorization (subtraction):	3,554 Curies	
Amount Needed for November Application 1-0018-00:	100 curies	96 ft3
 Total Volume and Activity to Perkin Elmer	 15,288 curies	 474 ft3

Please feel to contact me with any questions regarding our application.

Sincerely,

A handwritten signature in black ink, appearing to read 'John McCormick', with a large circular flourish at the end.

John McCormick