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19 November 2014

Brandon T. Hurley, Chairman
Texas Low Level Radioactive Waste Disposal Compact Commission
3616 Far West Boulevard
Suite 117, #294,
Austin, Texas, 78731

In Re: Amendment to import application 1-0077-00

Dear Chairman Hurley,

RAM Services, Inc. is requesting an amendment to the recently approved import application referenced above. After your most recent meeting we contacted QSA Global to discuss the preparation of the four drums which were recently approved. It was stated by their Radiation Safety Officer that the waste volumes for import would be correct but the isotopes and activities as initially requested would need to be increased if at all possible.

I have made the necessary corrections to Page 2 of the initial Annex B request and have bolded, underlined and increased the type size where changes were made. We are requesting compact approval to increase the activities as per our clients request and hope this will be acceptable to the Texas Low Level Radioactive Waste Disposal Compact Commission.

On behalf of RAM Services, I wish to thank you and the other Commissioners for considering our request.

Sincerely,

A handwritten signature in blue ink that reads "Jerry Wiza". The signature is written in a cursive, flowing style.

Jerry Wiza, President

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(Minimum terms that must be addressed in any Waste Importation Agreement offered to the Texas Low-Level Radioactive Waste Disposal Compact Commission in connection with an Application to Import Waste).

A. The proposed beginning and ending dates.

RAM Services requests that the Agreement remain in force from **01 October 2014** until **31 October 2015**.

B. Compliance with all applicable federal and state laws and rules including, without limitation, Texas Health and Safety Code (THSC), Chapter 403, §8.03.

RAM Services shall comply with the Texas Health and Safety Code Chapter 403 §8.03 without limitation and with all other applicable state and federal laws, rules, and regulations.

C. Liability for applicants' own acts, omissions, conduct, and relationships in accordance with applicable law.

RAM Services shall be responsible for its own acts, conduct, omissions, and relationships in the conduct of these operations.

D. Acknowledgment that the Commission under any circumstances may amend or revoke the agreement with prior notice and that under emergency circumstances the Commission may suspend authorization to import with such notice as it is able to give under the circumstances.

RAM Services acknowledges that the Commission may, with reasonable prior notice, amend or revoke any agreement for importation of waste and, under emergency conditions, may suspend the agreement with such notice as is possible.

E. Agreement shall not be assignable or transferable to any other person.

The Agreement between RAM Services and the TLRWDCC shall not be transferable to any other party.

F. Agreement is subject to receipt by the Compact Facility Operator and the Commission of written certification from the Texas Commission on Environmental Quality (TCEQ) prior to the acceptance of Generator's Nonparty Compact Waste that the waste to be imported is authorized for disposal under the Compact Facility license.

This Agreement is subject to receipt by the Compact Waste Facility Operator and the TLRWDCC of written certification by the TCEQ prior to acceptance of the waste that the waste to be imported is authorized for disposal at the Compact Waste Facility.

G. A description of the characteristics of the waste proposed for importation including (but not limited to) volume, type, physical form, total radioactivity, and radionuclide-specific activities.

The waste proposed for importation into the Compact Waste Facility shall include intact industrial gauging devices, sealed source capsules extracted from such devices, and sealed calibration and reference sources from academic, medical, and industrial institutions. When

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known, RAM Services will provide a complete accounting of all isotopes and their activities as of the proposed disposal date.

The waste shall be packaged in four 7.5 cubic foot (55-gallon) steel drums lined with concrete as required by the disposal site operator, TLLRWDC, and TCEQ.

The total activity will be approximately **64,221 Curies**. One of the drums will contain approximately 21 Curies of Special Form Cs-137 while the other 3 drums will contain Normal Form radioactive materials. The approximate activities for which disposal is requested are summarized below.

Isotope	milliCuries
<u>Fe-55</u>	<u>155</u>
<u>Co-57</u>	<u>15</u>
Co-60	137
<u>Ni-63</u>	<u>610</u>
<u>Cd-109</u>	<u>70</u>
<u>Cs-137</u>	<u>56000</u>
<u>Pm-147</u>	<u>7200</u>
<u>Am-241</u>	<u>34</u>

Three of the drums will require lead shielding in order to obtain radiation levels within U.S. Department of Transportation limits. Also, some of the intact devices contain lead shielding because the capsule could not be removed. RAM Services will obtain prior approval for disposal of the lead shielding.

H. A representation by the applicant that it has disclosed:

(1) The existence of unresolved violations pending against the applicant with any other regulatory agency with jurisdiction to regulate radioactive material.

(2) The existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due report(s) that the applicant has with the Commission.

(3) The existence of any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports that the applicant has with any other regulatory body, including, without limitation, the TCEQ.

RAM Services has no unresolved violations pending from any jurisdiction on any matter involving radioactive material. RAM Services is not aware of any violations, complaints, or unpaid fees from the TLLRWDC or reports past due to the TLLRWDC. RAM Services is not aware of any unresolved violations, complaints or past due reports to any other regulatory body including, without limitation the TCEQ.

I. An acknowledgement that a misrepresentation with respect to an item listed in H may result in the cancellation of the agreement.

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RAM Services acknowledges that any misrepresentation in Item H may result in the cancellation of the Agreement.

J. The obligation to report immediately to the Commission any allegation of the violation of any law, rule or regulation related to the storage, shipment or treatment of any form of radioactive material.

RAM Services shall immediately report to the Commission any allegation of the violation of any law, rule, or regulation related to the storage, treatment, or transportation of radioactive material.

K. A provision acknowledging the right of the Commission to audit or cause to be audited compliance with the agreement.

RAM Services acknowledges that the TLLRWDC or its agent has the right to audit compliance with the Agreement.

L. Agreement to comply to the extent applicable with the rules related to commingling adopted by the TCEQ in coordination with the Commission pursuant to THSC, §401.207(k).

RAM Services shall comply with the rules relating to comingling of party and non-party waste adopted by the TLLRWDC or the TCEQ.

M. An affirmation that no waste of international origin shall ever be included in the materials to be imported to the Compact facility.

No waste of international origin, as currently defined by the TLLRWDC and the TCEQ, shall ever be included in waste shipped by RAM Services to the Compact Waste Facility.

N. Any other matter required by 31 TAC §675.23 to be included in the agreement.

RAM Services has obtain Authorization from the Generators whose waste is proposed for shipment to the Compact Waste Facility to permit RAM Services to act as it agent and broker. RAM Services has obtained an export permit from the compact from which the waste originated. These shall be submitted in a timely manner to the TLLRWDC, the TCEQ, and the Compact Waste Facility Operator for approval.

For RAM Services, Inc.		
Jerry Wiza, President		18 August 2014
Name	Signature	Date

For the Commission		
Name	Signature	Date