

Figure: 31 TAC §675.23(e)(1)

**ANNEX A**

**TLLRWDC §675.23—IMPORTATION FORM**

**TEXAS LOW-LEVEL RADIOACTIVE WASTE DISPOSAL COMPACT COMMISSION APPLICATION FOR IMPORTATION OF NON-PARTY LOW-LEVEL RADIOACTIVE WASTE (NOTE: PURSUANT TO TEXAS HEALTH AND SAFETY CODE, §401.207(j), THIS PETITION MUST BE COMPLETED BY APPROPRIATE REPRESENTATIVES OF THE DEPARTMENT OF DEFENSE OR THE GENERATOR OF THE WASTE UNLESS THE GENERATOR IS A SMALL QUANTITY GENERATOR AS DEFINED IN 31 TAC §675.20(19), IN WHICH CASE THE PETITION MAY BE SUBMITTED BY AN APPROPRIATELY LICENSED BROKER) (Article III, Sec. 3.05(7) of the Compact)**

**I. Applicant Information:**

Entity Name: Aerojet Ordnance Tennessee

Contact Person, Title: Tim Wright, RSO Alternate

Phone: 423 - 753 - 1323

Email: timothy.wright@rocket.com

Website: \_\_\_\_\_

Business Address: 1367 Old State Route 34  
Jonesborough, TN 37659

Mailing Address: SAME

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Is applicant:

Generator

Broker

Licensed Waste Processor

Licensed Waste Collector

Department of Defense

**II. Generator Specifications:**

A. Generator type:

Industrial

Academic/Research

Medical

Utility

Government

B. Is waste from a "small quantity generator"?

Yes

No

**III. Agreement Period:**

Import applications generally will be granted only in single fiscal-year increments. If you are seeking a term that would extend beyond the end of a current fiscal year, please explain the unusual circumstances that would justify a deviation from this general rule?

9-1-19 through 8-31-20

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IV. Waste proposed for importation:

Waste Volume (Cubic Feet): 300

Waste Radioactivity (Curies): 10

Waste Classification:

- Class A,
- Class B, and/or
- Class C

Waste Form

- Stable
- Unstable

Does the proposed waste consist solely of sealed sources?

- No.
- Yes.

Compact and/or unaffiliated state, territory, possession, or district of the United States where the waste was generated (please list):

Tennessee

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Waste Description: \_\_\_\_\_

Depleted uranium oxides/metal from commercial  
shielding production - foundry and machining  
operations

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**V. Compliance**

Does Applicant 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 and attach applicable documents.

Does Applicant have any unresolved violation(s), complaint(s), unpaid fee(s), or past due reports associated with radioactive waste receipt, storage, handling, management, processing, or transportation 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 and attach applicable documents.

**VI. Certifications**

Applicant hereby certifies\* the following:

- The information provided herein is complete, accurate, and correct.
- The waste proposed for importation is not waste of international origin.
- The low-level radioactive waste for which this Import 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.
- The person submitting this Import Application is authorized by the Applicant to commit Applicant to each and every obligation and condition set forth herein and in the Agreement for Importation of Non-Party Compact Waste. A copy of a written document containing such authorization must be attached to this Import Application.
- Applicant has delivered to the specified disposal facility and TCEQ a copy of this Application for Importation of Compact Waste (along with any supplement or amendment thereto).

\* If any box is left unchecked, the Commission will assume that requirement was not met.

VII. Authorized Signatory:

Tim Wright  
Print or type name

Tim Wright  
Signature

RSO Alternate  
Title

6-5-19  
Date

VIII. ATTACHMENTS:

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



**TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
DIVISION OF RADIOLOGICAL HEALTH**

William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15<sup>th</sup> Floor Nashville, Tennessee 37243  
615-532-0364

## RADIOACTIVE MATERIAL LICENSE

### Amendment 167

Pursuant to Tennessee Department of Environment and Conservation Regulations, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules and regulations of the Tennessee Department of Environment and Conservation and orders of the Division of Radiological Health, now or hereafter in effect and to any conditions specified below.

LICENSEE		
1. Name <b>Aerojet Ordnance Tennessee</b>	3. License number <b>S-90009-J21</b>	
2. Address <b>1367 Old State Route 34 Jonesborough, Tennessee 37659</b>	4. Expiration date <b>October 31, 2021</b>	
	5. File no. <b>S-90009</b>	
6. Radioactive Material (Element and Mass Number)	8. Chemical and/or physical form	9. Maximum Radioactivity and/or quantity of material which licensee may possess at any one time.
<b>SEE SUPPLEMENTARY SHEETS</b>		

10. Authorized Use

**SEE SUPPLEMENTARY SHEETS**

#### CONDITIONS

11. Unless otherwise specified, the authorized place of use is the licensee's address stated in Item 2 above.

For the Commissioner  
Tennessee Department of Environment and Conservation

Date of Issuance: May 14, 2019

By: \_\_\_\_\_

*Amy McKenna*  
Division of Radiological Health  
Amy McKenna, Environmental Scientist 2



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License Number S-90009-J21

6. Radioactive Material (Element and Mass Number)	8. Chemical and/or Physical Form	9. Maximum Radioactivity and/or Quantity of Material Which Licensee May Possess at Any One Time
A. Natural and Depleted Uranium	A. See Item 10	A. Unlimited except for uranium hexafluoride which shall not exceed 1999 pounds.
B. Transuranics and Technetium 99 contaminants in Uranium depleted in Uranium 235.	B. See Item 10	B. Not to exceed a total of 100 picocuries/gram of each transuranic and not to exceed 500 picocuries/gram total for all transuranics. Not to exceed 500 picocuries/gram of Technetium 99.
C. Uranium 238	C. Plated Source	C. Unlimited number of sources
D. Thorium 228	D. Plated Source	D. 1.30 microcuries
E. Cesium 137	E. Sealed Source	E. 90 microcuries
F. Radium 226	F. Sealed Source	F. 0.0118 microcurie
G. Plutonium 239	G. Plated Source	G. 0.0122 microcurie
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10. <u>Authorized Use</u>		
A. and B. Uranium processing and manufacturing, including waste processing and storage, all as described in documents referenced in Condition 21.		
C. through G. Instrument standardization.		
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#### Conditions (continued)

12. The licensee shall comply with applicable provisions of 0400-20-04, 0400-20-05, and 0400-20-10 of "State Regulations for Protection Against Radiation."
13. A. Radioactive material authorized by this license shall be used by, or under the supervision of, individuals approved in accordance with application dated August 30, 2011, with attachments.  
  
 B. The Radiation Safety Officer for this license is **Michael D. McKinnon**. The Alternate Radiation Safety Officer for this license is **Tim Wright**.
14. The licensee is authorized to implement the adjusted Annual Limits on Intake (ALI), Derived Air Concentrations (DAC), and effluent concentrations resulting from particle size and solubility studies as described and in accordance with statements, representations, and procedures contained in letters dated March 28, 1994, with attachments, October 29, 1996 with attachments, and January 12, 1999, with attachments. The licensee shall reassess the authorized adjustments with the continuation of measurements and determinations in accordance with U.S. Nuclear Regulatory Guide 8.25, Item 4., "Adjustment in Derived Air Concentrations."
15. This amended license authorizes the continuation of activities (without specific reference to that activity) allowed previously on this license unless there is a specific modifying Condition or application reference modifying or deleting the activity.
16. The licensee is authorized to implement the depleted uranium manufacturing consolidation plan and associated decontamination, upgrades, and relocations outlined in letters dated October 19, 2009, with attachments, May 11, 2011, with attachment, June 13, 2011, and December 15, 2011, with attachments, in accordance with statements, representations, and procedures contained in those letters. The licensee shall maintain all Radiation Work Permits issued during the implementation of this plan and the associated decontamination work and shall at the discretion of the Radiation Safety Officer audit the performance under these permits and maintain records of the audits.
17. In addition to the possession limits in Item 9, the licensee shall further restrict the possession of licensed material to quantities below the limits specified in SRPAR 0400-20-10-.13(20) which require consideration of the need for an emergency plan for responding to a release of licensed material.





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#### License Number S-90009-J21

18. The licensee is authorized to conduct demil operations on penetrator assemblies in accordance with statements, representations, and procedures contained in letters dated June 12, 2012 (received June 27, 2012), with attachments, October 15, 2012, April 11, 2013, with attachments, July 8, 2014, and March 20, 2017, with attachments.
19. In accordance with letter dated February 21, 2013, with attached document entitled "Final Report of Aerojet Ordnance Tennessee, Building 300 Decontamination Phase One to Conditional Release, February 2013," the licensee is authorized to implement the conditional release of the former rolling mill and manufacturing areas from radiological controls. These areas may be used for non-DU manufacturing and storage.
20. The licensee is authorized to manufacture depleted uranium shielding equipment in accordance with statements, representations, and procedures contained in letter dated September 18, 2014, with attachments.
21. The licensee is authorized to release solid materials for unrestricted use in accordance with the surface contamination criteria in NRC NUREG-1757, Volume 1, Revision 2, section 15.11.1.1, "Release of Solid Materials with Surface Residual Radioactivity"
22. No provision of this license relieves the licensee from compliance with other Federal, State and local laws, ordinances, and regulations applicable to the licensee's activities.
23. The Licensee is authorized to perform lab scale testing of depleted uranium recycle to produce uranium hexafluoride in accordance with statements, representations, and procedures contained in letter dated February 14, 2019, with attachments. The licensee shall implement the appropriate radiation work permits and procedures described in the New Process Evaluation described in letter dated February 14, 2019. The Radiation Safety Officer shall institute this New Process Evaluation Procedure prior to commencement of the project and shall evaluate the progress and radiation safety of the project on a ninety day basis and have authority to modify the process if radiation safety standards and process control are not maintained. Reports of these evaluations shall be maintained for inspection by the Department.
24. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 8, and 9 of this license in accordance with statements, representations, and procedures contained in the following:
  - Application dated August 30, 2011, with attachments
  - Email received February 5, 2015, with attachments
  - Letters dated March 28, 1994, with attachments, October 29, 1996 with attachments, January 12, 1999, with attachments, October 19, 2009, with attachments, May 11, 2011, with attachment, June 13, 2011, December 15, 2011, with attachments, and June 12, 2012 (received June 27, 2012), with attachments, October 15, 2012, February 21, 2013,



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with attached document entitled "Final Report of Aerojet Ordnance Tennessee, Building 300 Decontamination Phase One to Conditional Release, February 2013," April 11, 2013, with attachments, July 8, 2014, September 18, 2014, with attachments, March 20, 2017, March 14, 2018, with attachments, January 3, 2019, and February 14, 2019 with attachments, and April 29, 2019.