UniTech Services Group
A SUBSIDIARY OF UNIFIRST CORPORATION

October 16, 2019

Texas Low-Level Radioactive Waste Disposal Compact Commission
919 Congress Avenue, Suite 830
Austin, TX 78701

RE: Texas Compact Import Agreement

To whom it may concern:

This correspondence is to confirm that UniTech Services Group, Inc., (UniTech) employees, Angela Kizer, Kevin Graczyk, and Robert Sasson, are authorized to commit UniTech to each and every obligation and condition set forth in the relevant TLLRWDCC §675.23 – Importation Form, and in the Agreement of Importation of Non-Party Compact Waste.

The above-named individuals are in control of waste shipments to Texas from UniTech's Oak Ridge Service Center (ORSC), Oak Ridge, TN. You may contact me, any of the above-named individuals, or Mr. Glenn Roberts, UniTech's Manager of Health Physics and Engineering, if you have any questions or require additional information.

Respectfully,
UniTech Services Group, Inc.,

George J Bakevich

George J. Bakevich
Vice President.

cc: file

Generator Certification Approval Letter

May 18, 2021

Kevin Graczyk
Site Manager
UniTech Services Group
2323 Zirconium Rd.
Oak Ridge, TN 37830

RE: UniTech Services Group – TNUNITECH

Generator Certification Valid May 18, 2021 through May 31, 2022

Mr. Graczyk,

On May 18, 2021, Waste Control Specialists LLC (WCS) completed a review and found UniTech Services Group to have an acceptable waste management program, and is authorized to ship waste materials to the Waste Control Specialists LLC Compact and Federal Disposal Facilities.

Be reminded, any change to UniTech Services Group's waste management program which reduces administrative control requires notification to Waste Control Specialists LLC. This Certification is valid until the last day of the month, 12 months from the date of issue.

The generator certification identification number is required on all documentation or correspondence with Waste Control Specialists LLC regarding waste disposal.

Waste Control Specialists LLC is pleased to have the opportunity to provide you with the quality waste management services that you need. If you have any questions or need further assistance, please feel free to contact me at (432) 525-8722 or at (432) 425-3517.

Sincerely,
WASTE CONTROL SPECIALISTS LLC

Jeff Shouse
Director of Quality Assurance

TEXAS
Health and Human
Services

Texas Department of State Health Services

John Hellerstedt, M.D.
Commissioner

May 14, 2020

UNITECH SERVICES GROUP INC
ATTN ROBERT SASSON
P O BOX 4925
OAK RIDGE TN 37830

Expiration Date: May 31, 2030
Registration No.: W0108
Authorized Use: Shipper

Mr. Sasson:

Unitch Services Group, Inc., is hereby registered to ship Low Level Radioactive Waste (LLRW) to the Texas LLRW disposal facility pursuant to Title 25 Texas Administrative Code (25 TAC) §289.257. This registration will expire on the date listed above.

In addition to the requirements and restrictions of 25 TAC §289.257, the following conditions are imposed on your activities as a general licensee while shipping LLRW in the state of Texas:

1. You shall immediately report by telephone all radioactive waste transportation accidents to the agency, at (512) 458-7460, and the local emergency management officials in the county where the radioactive waste accident occurs. All other accidents involving radioactive material shall be reported in accordance with 25 TAC §289.202(xx) and (yy).

2. If at any time during the registration period the Emergency Plan, Packaging Information and QA/QC Procedures are amended, you shall provide DSHS with copies of amended documentation at least five (5) days prior to the next LLRW shipment to the Texas LLRW disposal facility.

3. After this registration has expired, you shall apply for renewal of your registration by submitting RC Form 257-1 – "Application for a Low Level Radioactive Waste Shipper Registration".

   You shall provide DSHS with the required documentation at least fourteen (14) days prior to the next LLRW shipment to the Texas LLRW disposal facility.

If you have any questions, please contact me at (512) 834- 6661; or by electronic mail at RAMLicensing@dshs.texas.gov.

Sincerely,

Shawn E. Garza
Radiation Surveillance Branch
Program Coordinator

Enclosures: Emergency Telephone Notice

RHS 8-7

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Avenue, 15th Floor Nashville, Tennessee 37243
615-532-0364

RADIOACTIVE MATERIAL LICENSE

Amendment 27

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	UniTech Services Group, Inc.
2. Address	138 Longmeadow Street, Suite 202 Longmeadow, MA 01106-1155

3. License Number	R-M3007-A23
4. Expiration Date	January 31, 2023
5. File No.	R-M3007

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.
SEE SUPPLEMENTARY SHEETS		

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 28, 2021

By: _____
Division of Radiological Health
Ronald J. Parsons, Environmental Consultant

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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. H-3, C-14, Fe-55, and Ni-63	A. Any form suitable for transport under U.S. DOT Regulations except for sealed sources	A. 100 curies
B. Any radioactive material with atomic numbers 3 through 91, inclusive, except for C-14, Fe-55, and Ni-63	B. Same as 8.A.	B. 80 curies +
C. U-233	C. Same as 8.A.	C. 200 grams *
D. Uranium enriched in the isotope U-235	D. Same as 8.A.	D. 350 grams * of U-235
E. Plutonium	E. Same as 8.A.	E. 200 grams *+ and not to exceed 1 curie
F. Transuranics other than special nuclear material	F. Same as 8.A.	F. 1 curie +
G. Source Material (Natural or Depleted Uranium, Thorium)	G. Same as 8.A.	G. 12 Curies

* For each kind of special nuclear material determine the ratio between the quantity of that special nuclear material and the quantity specified here for the same kind of special nuclear material. The sums of such ratios for all kinds of special nuclear material in combination shall not exceed "1" (i.e. unity).

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+ This authorization does not include the possession of quantities of single radionuclides where the sum of activities equals or exceeds those in the Table of Risk Significant Quantities (Category 2 Quantities, IAEA Safety Guide No. RS-G-1.9, Categorization of Radioactive Sources, August 2005). It also does not authorize the possession of quantities of multiple radionuclides where the sum of the ratios of activities in the above Table equals or exceeds unity.

H. Any radioactive material	H. Sealed source	H. No single source to exceed 10 microcuries of alpha emitting material, 100 microcuries of beta and/or gamma emitting material. Total not to exceed 1000 microcuries.

10. Authorized Use

A. through G. Storage, handling, decontamination, service, and repair of contaminated equipment; survey for release of potentially contaminated materials; unpacking, segregating, sectioning, and packing of radioactive materials; decontamination of surface contaminated materials; OREX material processing; Research and Development (R&D) testing, and Bulk Survey for Release (BSFR) operations. These authorizations shall be conducted in accordance with statements, representations, and procedures contained in documents referenced in conditions of this license.

H. Calibration and reference sources.

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. Radioactive material authorized by this license shall be used and stored at the UniTech Services Group, Inc. Oak Ridge Service Center (ORSC), East Tennessee Technology Park, 2323 Zirconium Way, Oak Ridge, TN 37830.

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14. A. Radioactive material authorized by this license shall be used by, or under the supervision of, Kevin Graczyk, Angela Kizer, Wes Taylor, Robert Sasson, or Torrie Harrison.

    B. The Radiation Safety Officer for this license is Robert Sasson. **The Alternate Radiation Safety Officers are Kevin Graczyk and Angela Kizer.**

15. A. The licensee shall develop and maintain a written radiation protection manual that ensures the implementation of the radiation protection program in accordance with "State Regulations for Protection Against Radiation" (SRPAR), ALARA, and documents referenced in conditions of this license. Changes to this manual require prior written approval from the Department.

    B. In addition, the licensee shall develop and implement written standard operating procedures to ensure all activities involving the handling and/or use of radioactive materials authorized by this license are carried out in a manner consistent with SRPAR, ALARA, the licensee's Radiation Protection Manual, and the documents referenced in conditions of this license.

    C. These procedures may be modified without prior approval of the Department when deemed appropriate and documented by the Radiation Safety Officer. However, adherence to the current procedures as written shall be considered a condition of this license. The written procedures required by this condition shall be available for inspection by the Department. A copy of the current procedures shall be forwarded to the Department upon request.

16. In addition to other requirements of this license or of Chapter 0400-20-05-.60 "State Regulations For Protection Against Radiation," the licensee shall conduct operations so that radiation levels in unrestricted areas would not cause an individual, assuming an occupancy of one (1), to receive a total effective dose equivalent in excess of 500 millirems in one calendar year. These radiation levels shall be appropriately monitored by the licensee, and records of such monitoring shall be maintained for inspection by the Department. For calculational purposes of this condition, the licensee shall base its anticipated exposure to a member of the public upon the sum of the maximally exposed TLD and the highest air concentration derived using the latest available pertinent data.

17. No radioactive material (excluding calibration and reference sources; installed Systems, Structures, and Components; and tools and equipment used in conducting licensed activities) or radioactive waste may be possessed under this license, from its time of receipt,

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until its transfer from the facility, for a period of time greater than three hundred sixty-five (365) days.

18. No radioactive material or radioactive waste may be stored so as to exceed the following stacking limits except that these may be doubled in the 4800 ft^2 covered storage space:

Container Type	Stacking Limit
Drums	3 high
B-25 Boxes	3 high
B-12 Boxes	5 high
Sea-Land Container.	1 high
Any other strong tight container	10 feet nominal unless the natural height of the container exceeds 10 feet

This condition also includes "waste radioactive material" generated under the authority of this license.

19. The licensee shall maintain complete and accurate records of the receipt and disposal of radioactive material. The licensee shall, for radioactive material no longer useful for any purpose and for any equipment or supplies contaminated with such material for which further use and decontamination is not planned, define those materials as radioactive waste and treat them as such in accordance with the following provisions:

A. Radioactive waste material shall not be stored with non-radioactive waste.

B. A written record of all radioactive waste material shall be maintained until it has been determined by a suitable survey or radioassay that it has decayed to background levels or until it has been shipped to an authorized recipient in accordance with all applicable regulations. Accountability of radioactive waste material prepared for shipment but not yet shipped from the licensee's premises shall be maintained by the licensee by an internal record system such that the licensee is constantly aware of the material's location and the proposed time of shipment. Individuals who are involved in the shipping of such material and/or the storage of such material prior to shipment, shall be trained in the precautions necessary for such handling and storage.

C. For material which has decayed to background levels as determined by radioassay or external level as measured with appropriately calibrated instruments, records shall indicate that the material was determined to be no longer radioactive and will indicate the methods and results of the survey or analysis.

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D. Shipment records of radioactive waste material shall be maintained and the licensee shall require written confirmation from the authorized recipient of such material that this material has been received.

E. All records and written confirmations required by this condition shall be maintained for inspection by the Department.

The requirements for this condition are in addition to any other requirements for the handling and/or disposal of radioactive material contained in this license and "State Regulations for Protection Against radiation."

20. The licensee shall not accept either radioactive waste and/or items contaminated or potentially contaminated with licensable quantities of radioactive material or radioactive materials or items from licensable activities for repackaging, processing, storage pending transfer/disposal, or transfer/disposal unless the shipper of such waste possesses a valid license for delivery issued pursuant to 0400-20-10-.32 of "State Regulations for Protection Against Radiation."

21. Written assurances must be furnished by the facility shipping the radioactive material indicating that the facility may accept return of the material processed or unprocessed. In addition, for states outside the Southeast Compact the state or appropriate Compact must be a signatory to the Interregional Access Agreement for Waste Management or assurances shall be obtained from the appropriate state governor's office, the state radiation control program, and the appropriate Compact official, if any.

22. The licensee shall establish in every contractual obligation relating to radioactive materials the ability to return radioactive materials, processed or unprocessed, to the prior licensed or exempt possessor.

23. The license may release radioactive material into the sanitary sewerage system in accordance with 0400-20-05-.122 of "State Regulations for Protection Against Radiation."

24. The licensee is authorized to store containers which previously contained radioactive material (empty containers) in areas not covered by financial assurance including outside of the process and storage buildings. Each empty container in outside storage shall:

A. Contain no hazardous material;

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B. Be emptied of contents as far as practical (49 CFR 173.428);

C. Contain no standing liquid;

D. Be in unimpaired condition and securely closed so that there will be no leakage under conditions normally incident to transportation or storage [49 CFR 173.428(b)];

E. Have no radiation levels on the external surface of the package exceeding 0.5 mR/hr average and 2.0 mR/hr hotspot;

F. Have no removable surface contamination on the external surface of the package exceeding 10% of Regulatory Guide 1.86 free release limits;

G. Have no internal contamination exceeding:

1) Beta and gamma emitters and low toxicity alpha emitters *	2400 dpm/cm^2
2) All other alpha emitters	240 dpm/cm^2

H. Have any labels previously applied removed, obliterated, or covered and an "Empty" label affixed [49 CFR 173.428 (e)]

I. Be stored on a paved (asphalt or concrete) surface, or other surface in which water runoff from that surface is appropriately monitored for radioactivity;

J. Be arranged such that the containers can be visually inspected on all sides.

* As defined by U.S. DOT 49 CFR 173.403

25. The following evaluations shall be performed for all process ventilation systems:

1) Air balance within the RCA at least semi-annually, and following any ventilation system or process changes which could potentially alter the effectiveness of the system,

2) Particulate removal efficiency of the main filtration system HEPA filters by DOP or comparable testing in accordance with pertinent ANSI standards immediately following installation of new HEPA filters or at least semi-annually.

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26. Any licensed sealed source is exempt from such leak tests when the source contains 100 microcuries or less of beta and/or gamma emitting material or 10 microcuries or less of alpha emitting material.

27. The licensee shall not open sealed sources containing radioactive material.

28. The licensee shall conduct a physical inventory every six (6) months to account for all sealed sources received and possessed under this license. Records of inventories shall be maintained for inspection by the Department.

29. The licensee is authorized to release surface contaminated materials for unrestricted use in accordance with statements, representations, and procedures contained in its Radiation Protection Manual, Revision 1, and applicable criteria in NRC Regulatory Guide 1.86.

30. The licensee is authorized to stage containers of radioactive material in areas not covered by financial assurance provided that no individual container is present for more than 12 hours. This authorization is for licensed material for future work, and licensed material that meets surface free release criteria as evidenced by survey. Except for surface contaminated material that meets free release criteria, waste shall be staged in closed containers on paved surfaces with no opening of containers or loading of wastes.

31. 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 "State Regulations for Protection Against Radiation" 0400-20-10-.13(17)(a) which require consideration of the need for an emergency plan for responding to a release of licensed material.

32. The licensee is authorized to receive, possess, and use any radioactive material distributed under a general license, issued by the U. S. Nuclear Regulatory Commission, or another Agreement State, without being specifically referenced in Items 6, 8, 9, and 10 of this license. Notwithstanding any other conditions of this license, the general licensee may possess and use radioactive material received under the provisions of "State Regulations for Protection Against Radiation," 0400-20-10 in accordance with the requirements provided at the time of transfer of the radioactive material under the terms of the general license.

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33. The licensee has provided $537,600.00 US (five hundred thirty-seven thousand six hundred US Dollars) in financial assurance monies in accordance with "State Regulations for Protection Against Radiation" 0400-20-10-.12(4). This financial assurance will provide for a total of 12,800 square feet of licensed space, under current Departmental calculation policy.

34. Bulk Survey for Release (BSFR)

A. The licensee is authorized to characterize and release bulk material for disposal to the Chestnut Ridge Landfill in Heiskell, TN in accordance with statements, representations, and procedures contained in letters dated December 2, 2014, with attachments, March 13, 2015, with attachments, March 16, 2015, with attached disk entitled Chestnut Ridge Landfill RESRAD Modeling, email dated April 1, 2015, with attachments, email dated April 20, 2015, and the most current BSFR concentration limits established by the Division of Radiological Health for Chestnut Ridge Landfill. The Radium 226 disposal limit for Chestnut Ridge Landfill will be 5 pCi per gram.

B. The licensee is authorized to characterize and release bulk material for disposal to the Carter Valley Landfill in Church Hill, TN in accordance with statements, representations, and procedures contained in letter dated March 7, 2017, with attachments, and the most current BSFR concentration limits established by the Division of Radiological Health for Carter Valley Landfill. The Radium 226 disposal limit for Carter Valley Landfill will be 5 pCi per gram.

C. Records of disposals made under this condition shall be submitted quarterly to the Division of Radiological Health, William R. Snodgrass Tennessee Tower, 15th Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee 37243. Monitoring of materials for contamination for release as authorized by this condition is only to be conducted at the licensee's facilities as specified in Condition 14 of this license, and not at customer or other job sites.

D. The licensee shall meet the requirements of the March 2020 DRH-RAM-G-410-004-03192020 Licensing Requirements for Evaluation and Acceptance of Licensee Requests for the Disposal of Materials with Extremely Low Levels of Contamination in Class 1 (Subtitle D) Landfills (Bulk Survey for Release (BSFR))

E. For calendar year 2021 the licensee is approved to dispose of 7725 tons of material in the Chestnut Ridge Landfill. For calendar year 2021 the licensee is approved to dispose of 2746 tons of material in the Carter Valley Landfill.

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35. 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.

36. 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 received September 14, 2012, with attachments, "Radiation Safety Guide (RSG) for the Oak Ridge Service Center (ORSC)" dated September 2012,
- Emails dated November 2, 2012, with attached letter dated November 1, 2012, April 1, 2015, with attachments, email dated April 20, 2015, October 11, 2017 (two), email dated October 12, 2017, **May 20, 2021, with attachments**
- CERTIFICATE OF INSURANCE FOR RECLAIMING received January 11, 2013
- Letters dated October 15, 2012, with attachments, January 7, 2013, with attachment, January 15, 2013, March 20, 2013, with attachments, May 20, 2013, with attachments, July 8, 2013, with attachments, August 19, 2013, October 30, 2013, with attachments, November 14, 2013, with attachments, December 16, 2013, with attachments, November 6, 2014, with attachments, December 2, 2014, with attachments, March 13, 2015, with attachments, March 16, 2015, with attached disk entitled Chestnut Ridge Landfill RESRAD Modeling, June 1, 2015, July 16, 2015, with attachments, including Radiation Protection Manual, Revision 1, May 16, 2016, October 4, 2016, with attachment, March 9, 2017, with attachments, November 9, 2017, with attachments, June 18, 2018, with attachment, August 31, 2020, **and May 11, 2021, with attachments.**