

Figure: 31 TAC §675.23(e)(1)

ANNEX A

TLLRWDCC §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: U.S. Army Joint Munitions Command
% Aerojet Ordnance Tennessee

Contact Person, Title: Tim Wright, RSO

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 *E. Joseph Hart, HQ U.S Army Joint Munitions Command, AMSJM-SF, 1 Rock Island Arsenal, Rock Island, IL 61299-6000
Phone 309-782-1124
Email harte@osc.army.mil*

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?

9-1-16 through 8-31-17

IV. Waste proposed for importation:

Waste Volume (Cubic Feet): 1440

Waste Radioactivity (Curies): 40.59

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

Waste Description: Depleted uranium oxides/metal
from Army tank penetrator production - foundry
and machining operations

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:

Timothy Wright

Print or type name

Jim Wright

Signature

Radiation Safety Officer

Title

5-3-16

Date

VIII. ATTACHMENTS:

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

Figure: 31 TAC §675.23(e)(2)

ANNEX B
TERMSHEET

(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.
9-1-16 through 8-31-17
- B. ✓ Compliance with all applicable federal and state laws and rules including, without limitation, §8.03 of the Compact as compiled in Texas Health and Safety Code (THSC), Chapter 403.
- C. ✓ Liability for applicants' own acts, omissions, conduct, and relationships in accordance with applicable law.
- D. ✓ Acknowledgement 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.
- E. ✓ Agreement shall not be assignable or transferable to any other person.
- 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 Non-Party Compact Waste that the waste to be imported is authorized for disposal under the Compact Facility license.
- 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. See page 2
- 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.
- ~~(8)~~ 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.
- ✓ An acknowledgement that a misrepresentation with respect to an item listed in H may result in the cancellation of the agreement.
- ✓ 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.
- ✓ A provision acknowledging the right of the Commission to audit or cause to be audited compliance with the agreement.
- ✓ 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).
- M. An affirmation that no waste of international origin shall ever be included in the materials to be imported to the Compact Facility.
- N. Any other matter required by 31 TAC §675.23 to be included in the agreement.

Depleted uranium (U-238) oxides/metal waste
1440 cubic feet

40.58 Curies Depleted Uranium (311,000 - 366,000 pCi/g)
14,844 micro Curies TC-99 (134 pCi/g of DU)

Jim Wright

5-3-16

Wright, Timothy

From: Leigh Ing <ing.leigh@gmail.com>
Sent: Tuesday, September 15, 2015 12:17 PM
To: HART, E J (Joe) CIV USARMY JMC (US)
Cc: Wright, Timothy; Leigh Ing
Subject: [EXTERNAL] Re: Authorization to sign AOT DU Metal/Oxide waste import application

Thank you, Mr. Hart. This should suffice. If I need additional information, I will let you know.

Leigh Ing
Executive Director
TLLRWDC
512-217-8045

On Tue, Sep 15, 2015 at 10:57 AM, HART, E J (Joe) CIV USARMY JMC (US) <earl.j.hart.civ@mail.mil> wrote:

Ms Ing,

We concur with Mr. Timothy Wright signing the waste import application for Army responsible DU Metal/Oxide, from the Aerojet facility in Jonesborough, TN, for import to the WCS facility near Andrews, TX. If you need any additional information from me regarding this matter, please let me know.

v/R

Joe Hart
Health Physicist
HQ, JMC
Safety and Risk Management Directorate
AMSJM-SFR
2695 Rodman Avenue
Rock Island, IL 61299-6000
Comm [\(309\)782-1124](tel:3097821124), DSN 793-1124
FAX [\(309\) 782-2289](tel:3097822289), DSN 793-2289

-----Original Message-----

From: Wright, Timothy [mailto:timothy.wright@Rocket.com]
Sent: Tuesday, September 15, 2015 10:24 AM
To: HART, E J (Joe) CIV USARMY JMC (US) <earl.j.hart.civ@mail.mil>
Subject: FW: [EXTERNAL] Leigh Ing's Contact Information

Joe,

Please provide Leigh Ing with a statement that authorizes me to sign the waste import application for the Army responsible DU Metal/Oxide waste.



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
 DIVISION OF RADIOLOGICAL HEALTH
 3RD FLOOR, L & C ANNEX, 401 CHURCH STREET, NASHVILLE, TN 37243

RADIOACTIVE MATERIAL LICENSE

Amendment 154

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.

1. Name Aerojet Ordnance Tennessee 2. Address 1367 Old State Route 34 Jonesborough, Tennessee 37659		3. License number S-90009-J21 amended in its entirety	
		4. Expiration date October 31, 2021	
		5. File no. 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.	
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.

See Supplementary Sheets

For the Commissioner
 Tennessee Department of Environment and Conservation

Date of Issuance October 28, 2011

By: _____

Ronald J. Parsons
 Division of Radiological Health
 Ronald J. Parsons
 Health Physicist

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TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
3RD FLOOR, L&C ANNEX, 401 CHURCH STREET, NASHVILLE, TENNESSEE 37243

RADIOACTIVE MATERIAL LICENSE

Amendment 154

Supplementary Sheet

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License Number S-90009-J21

6. Radioactive Material (Element and <u>Mass Number</u>)	8. Chemical and/or <u>Physical Form</u>	9. Maximum Radioactivity and/or Quantity of Material Which Licensee May <u>Possess at Any One Time</u>
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

10. Authorized uses

A. and B. Uranium processing and manufacturing, including waste processing and storage, all as described in documents referenced in Condition 19.

C. through G. Instrument standardization.



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION
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3RD FLOOR, L&C ANNEX, 401 CHURCH STREET, NASHVILLE, TENNESSEE 37243

RADIOACTIVE MATERIAL LICENSE

Amendment 154

Supplementary Sheet

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License Number S-90009-J21

Conditions (continued)

12. The licensee shall comply with applicable provisions of 1200-02-04, 1200-02-05, and 1200-02-10 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 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 letter dated October 19, 2009, with attachments, May 11, 2011, with attachment, and June 13, 2011, 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 1200-2-10-13(17)(a) and (b) which require consideration of the need for an emergency plan for responding to a release of licensed material.
18. 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.



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RADIOACTIVE MATERIAL LICENSE

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Supplementary Sheet

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License Number S-90009-J21

19. 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
- 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, and June 13, 2011.