



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

RADIOACTIVE MATERIAL LICENSE

Amendment 35

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		3. License number R-01084-C23
1. Name	Philotechnics, Ltd.	4. Expiration date March 31, 2023
2. Address	201 Renovare Blvd. Oak Ridge, Tennessee 37830	5. File no. R-01084
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.
S E E S U P P L E M E N T A R Y S H E E T S		

10. Authorized Use

S E E S U P P L E M E N T A R Y S H E E T S

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: June 16, 2017

By: Charles Arnott

Division of Radiological Health
 Charles Arnott, Environmental Consultant



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6. Radioactive Material (Element <u>and Mass Number</u>)	8. Chemical and/or <u>Physical Form</u>	9. Maximum Radioactivity and/or Quantity of Material Which Licensee May Possess <u>at Any One Time</u>
A. Tritium	A. Any form suitable for transport under U.S. DOT Regulations	A. 20,000 curies
B. C-14	B. Same as 8.A.	B. 50,000 curies
C. Am-241, Am-241/Be	C. Same as 8.A.	C. 15 curies aggregate ^a
D. Pu-238, Pu-239/Be	D. Same as 8.A.	D. 2 curies aggregate ^{a, b}
E. Cf-252	E. Same as 8.A.	E. 5 curies ^a
F. Cm-244	F. Same as 8.A.	F. 13 curies ^a



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G. Co-60	G. Same as 8.A.	G. 8 curies ^a
H. Cs-137	H. Same as 8.A.	H. 25 curies ^a
I. Gd-153, Sr-90	I. Same as 8.A.	I. 250 curies aggregate ^a
J. Ir-192	J. Same as 8.A.	J. 20 curies ^a
K. Pm-147	K. Same as 8.A.	K. 9000 curies ^a
L. Se-75	L. Same as 8.A.	L. 50 curies ^a
M. Tm-170	M. Same as 8.A.	M. 5000 curies ^a
N. Yb-169	N. Same as 8.A.	N. 75 curies ^a
O. Any radioactive material with atomic number 3-91 inclusive not listed above	O. Same as 8.A.	O. 10 curies aggregate ^a
P. Source material	P. Same as 8.A.	P. 30,000 lbs
Q. Transuranics not listed elsewhere in this license	Q. Same as 8.A.	Q. 2 curies



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R. U-233	R. Same as 8.A.	R. 200 grams ^b
S. Uranium enriched in the U-235 isotope	S. Same as 8.A.	S. 350 grams of contained U-235 ^b
T. Plutonium	T. Same as 8.A.	T. 200 grams ^b
U. Any radioactive material	U. Sealed, plated, or foil sources	U. 500 microcuries with no single source greater than 100 microcuries ^b
V. Any radioactive material	V. Sealed sources (Any sources which have been evaluated and approved by either the U.S. NRC and/or an Agreement State except for sources specified in Condition 28 which do not require evaluation and approval)	V. No single source to exceed 120 millicuries. Total not to exceed 500 millicuries..

^a The sum of ratios of possession to possession limit for all licensed material in Items C through O and as found in 0400-20- 05-.164 of "State Regulations for Protection Against radiation" shall not exceed "1" (i.e. unity).



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- ^b The sum of ratios of possession to possession limit for special nuclear material shall not exceed "1" (i.e. unity). The total possession for plutonium authorized under this license shall not exceed 200 grams.

10. Authorized Use

A. through T.

1. Collection, handling, and packaging of radioactive waste materials at customer facilities. The licensee may decontaminate and decommission areas of contamination that may result from its performance of the above activities.
2. Preparation for transportation and transfer of radioactive waste materials from customer facilities to facilities licensed by the Department, the U. S. Nuclear Regulatory Commission, or another Agreement State to receive these materials. (All radioactive materials offered for transport shall meet the U.S. Department of Transportation Regulations for interstate commerce. This license does not exercise jurisdiction over these radioactive materials while in transport).
3. Delivery of licensed material to a carrier for transport, or transport of licensed material.
4. Radiological survey services at customer facilities including the collection and transfer of samples for analysis to facilities licensed by the Department, the U.S. Nuclear Regulatory Commission, or another Agreement State to receive these materials and perform this activity.
5. The performance and analysis of leak tests of sealed sources including for customer service.
6. Storage, repackaging, shipment, manual size reduction, shearing, compaction, loading and unloading of radioactive waste, solidification and/or absorption of liquid waste, removal of sealed sources from devices for transfer or disposal, encapsulation of



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sealed sources, operation and closure of LANL Special Form Capsules, mechanical alteration of ^{68}Ge - ^{68}Ga sources/standards, radiological surveys and sample analysis, storage and maintenance of tools and reusable equipment, and storage for decay.

7. Decontamination and Decommissioning services (D & D) at customer facilities including removal of devices containing sources from service.
- U. Calibration and reference sources.
- V. The licensee is authorized to receive, acquire, possess, and transfer radiological byproduct, source, and special nuclear material, types of which are listed in the license, and are to be used as described in the license for training, field calibrations of instrumentation, daily instrument operation checks, and field support of emergency response exercises.

Conditions

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. Operations of this license except in Item 10.A. through T. 6., may be conducted at temporary job sites of the licensee, in areas not under exclusive Federal jurisdiction, throughout the State of Tennessee. Operations in Items 10.A. through T. 5, 6., and U. may be conducted at 201 Renovare Blvd., Oak Ridge, TN 37830

Before radioactive materials can be used at a temporary job site at any Federal facility, the jurisdictional status of the job site must be determined. If the jurisdictional status is unknown, the Federal agency should be contacted to determine if the job site is under exclusive Federal jurisdiction. A response should be obtained in writing or a record should be made of the name and title of the person at the Federal agency who provided the determination and the date that it was provided. Authorization for use of radioactive materials at job sites under exclusive Federal jurisdiction shall be obtained either by: (1)



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filing a NRC Form-241 in accordance with 10 CFR 150.20(b) "Recognition of Agreement State Licenses"; or (2) applying for a specific NRC license.

Before radioactive materials can be used at a temporary job site in another State, authorization shall be obtained from the State if it is an Agreement State, or from the NRC for any non-Agreement State, either by filing for reciprocity or applying for a specific license.

14. A. Radioactive material authorized by this license shall be used by, or under the supervision of, William Button, Wesley Stout, Robert McIntosh, Justin Button, Kenneth Gavlik, Elizabeth Broda, Paul Nelson, Robert Pastor, Donald Hartje, Shaquille Dews, or other individuals designated in writing by the Radiation Safety Officer. The Radiation Safety Officer shall, through combination of review of individuals' training and experience and oral interviews, have the authority to name authorized users under the license. Records of authorized user designation shall be retained for inspection by the Division of Radiological Health.

B. The Radiation Safety Officer for this license is William Button.

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 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 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



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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 including sealed sources received for disposal (excluding calibration and standardization sources, waste received for decay-in-storage, and Philotechnics-owned reusable equipment not considered waste) or radioactive waste may be possessed under this license, from its time of receipt, 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:

<u>Container Type</u>	<u>Stacking Limit</u>
1. Drums	3 high
2. B-25 Boxes	3 high
3. B-12 Boxes	5 high
4. Sea-Land Cont.	1 high
5. Intermodal containers	1 high
6. QC Boxes	2 high



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7. Any other strong 10 feet nominal unless the natural height of the
tight container 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.
 - 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.



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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 Regulation 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 licensee is authorized to hold radioactive material with a physical half-life of less than or equal to 120 days for decay-in storage before disposal in ordinary trash, provided:
 - A. Before disposal as ordinary trash, the waste shall be surveyed at the container surface with the appropriate survey instrument set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.
 - B. A record of each such disposal permitted under this license condition shall be retained for three years. The record must include the date of disposal, the date on



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which the licensed material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.

24. The licensee is authorized to store empty containers outdoors in accordance with the following criteria:

The empty package in storage shall:

- a. Contain no hazardous material
- b. Be emptied of contents as far as practical (49CFR 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 [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 Reg. Guide 1.86 free release limits
- g. Have no internal contamination exceeding:

Beta and gamma emitters and low toxicity alpha emitters *	2200 dpm/cm ²
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All other alpha emitter	220 dpm/cm ²
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[173.428(c)] (* As defined in 173.403)

- h. Have any labels previously applied removed, obliterated, or covered and an "Empty" label affixed [173.428 (d)]



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- i. Be stored on a paved (asphalt or concrete) surface
 - j. Be arranged such that all containers can be visually inspected on at least one side
25. This license does not authorize the disposal of liquid wastes to the sanitary sewerage system. Liquid wastes shall only be handled or stored in areas that will contain the full volume of liquid from the largest container, or 10% of the total full volume from all containers, whichever is larger.
26. 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.
27. A. Sealed sources authorized by this license in Items U. through Z. shall be tested for leakage and/or contamination at intervals not to exceed six (6) months. Sealed sources authorized by this license in Items AA. And BB. shall be tested for leakage and/or contamination at intervals not to exceed twelve (12) months. In the absence of a certificate from a transferor indicating that a test has been made within six (6) months prior to transfer, the sealed source shall not be put until use until tested.



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- B. The test shall be capable of detecting the presence of 0.005 microcurie of radioactive material on the test sample. The test sample shall be taken from the sealed source or from the surface of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak tests shall be kept in units of microcuries and maintained for inspection by the Department.
- C. If the test reveals the presence of 0.005 microcurie or more of removable contamination, the licensee shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Department regulations. A report shall be filed within five (5) days of the test with the Division of Radiological Health, Tennessee Department of Environment and Conservation, William R. Snodgrass Tennessee Tower, 15th Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243, describing the equipment involved, the test results, and the corrective action taken.
- D. Tests for leakage and/or contamination shall be performed by the licensee or by other persons authorized by this Department, the U.S. Nuclear Regulatory Commission, or another Agreement State to perform such services.
28. Notwithstanding the periodic leak test required by Condition 27, 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.
29. The licensee shall not open sources containing radioactive material.
30. The licensee has provided \$267,372.00 (Two Hundred Sixty Seven Thousand Three Hundred Seventy Two 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 6,366 square feet of licensed space under current Departmental calculation.



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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 0400-20-10 of "State Regulations for Protection Against Radiation" in accordance with the requirements provided at the time of the transfer of the radioactive material under the terms of the general license.
33. The licensee is authorized to perform tests for leakage and/or contamination upon sealed sources containing these radioactive materials and upon devices which contain sealed sources. This license also authorizes possession of radioactive material collected as a result of these tests. Such waste material will be disposed of in conformance with 0400-20-05-.120 of "State Regulations for Protection Against Radiation."
34. The tests for leakage and/or contamination shall be capable of detecting 0.005 microcurie of contamination on the test sample, or in the case of radium, the escape of radon at the rate of 0.001 microcurie per 24 hours. The test samples shall be taken from the sealed source or from the surface of the device in which the sealed source is permanently mounted or stored on which one might expect contamination to accumulate. Records of leak tests shall be kept in units of microcuries and maintained for inspection by the Department. The customer shall be furnished a report of leak tests results in units of microcuries. If the test reveals the presence of removable contamination equivalent to or greater than 0.005 microcurie, or in the case of radium, the escape of radon at the rate of 0.001 microcurie per 24 hours. the customer of the licensee shall be informed of the Department's requirements as follows: "The licensee



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shall immediately withdraw the sealed source from use and shall cause it to be decontaminated and repaired or to be disposed of in accordance with Department regulations. A report shall be filed within five days of the test with the Tennessee Department of Environment and Conservation, Division of Radiological Health, William R. Snodgrass Tennessee Tower, 15th Floor, 312 Rosa L. Parks Avenue, Nashville, Tennessee, 37243, describing the equipment involved, the test results, and the corrective action taken.”

35. The licensee is authorized to release material from radiological controls for unrestricted use, either at temporary jobsites or the licensee’s facility as authorized in Condition 13, provided that it has been surveyed to confirm that it meets the criteria of NRC Regulatory Guide 1.86, and is acceptable to the regulatory agency maintaining jurisdiction. This authorization is for material whose surfaces are appropriate for fixed and removable contamination surveys, but does not include material with volumetric contamination. This authorization shall be conducted in accordance with statements, representations, and procedures contained in documents referenced in conditions of this license.
36. The licensee may perform decontamination and decommissioning (D & D) services as authorized in this license in accordance with the most recently issued revised volumes of U.S. NRC NUREG-1757 and associated guidance documents. A decommissioning plan (DP), when required by NUREG-1757, shall be submitted for approval to the regulatory agency maintaining jurisdiction before work begins.

Notwithstanding, the licensee shall submit a DP if requested by the regulatory agency maintaining jurisdiction.

37. The licensee is authorized to mechanically alter ⁶⁸Ge-⁶⁸Ga sources, phantoms, rods, and similar standards associated with operation of domestic only positron emission tomography (PET) scanners to render them unusable. These sources/standards are to be subsequently forwarded to an appropriately licensed entity for further processing and/or disposal. Alteration work will be performed in accordance with statements, representations, and procedures contained in letter dated August 13, 2013.



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38. 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.
39. 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 December 12, 2012, with attachments (redated March 5, 2013)
 - Letters dated January 22, 2013, with attachments, March 6, 2013, with attachments, August 13, 2013, February 18, 2014, with attachments, February 6, 2015, with attachments, March 19, 2015, with attachments, July 20, 2015, with attachments, December 15, 2015, with attachments, April 13, 2016, with attachments, August 2, 2016, with attachment, October 3, 2016, March 14, 2017, and May 31, 2017, with attachments..