



A SUBSIDIARY OF UNIFIRST CORPORATION

6/24/2002

Mr. Paul Lohaus,
United States Nuclear Regulatory Commission
Director Office of State and Tribal Programs
1 White Flint North 11555 Rockville Pike
Rockville, MD 20852-2738

Mr. John W. Hickey
United States Nuclear Regulatory Commission
Chief: Materials Safety and Inspection Branch
2 White Flint North 11545 Rockville Pike
Rockville, MD 20852-2738

Dear Sirs,

UniTech Services Group, Inc. (UniTech), operator of nuclear laundry facilities in the United States and abroad, requests your advice regarding the principal Nuclear regulatory Commission and Agreement State requirements that would apply to a business line we are evaluating. The business involves supplying disposable protective garments to NRC and Agreement State licensees, and providing a disposal service for the used/contaminated garments. The contaminated garments would be rendered into a liquid form and the resulting solution discharged to a sanitary sewer. The solid residue disposed of in a licensed radioactive waste disposal facility.

In evaluating the regulatory requirements that would affect these business activities, we assumed that the contaminated clothing being returned for disposal would be considered radioactive waste. Based on this assumption, we identified the regulatory requirements listed in the attachment to this letter as being particularly applicable to the activities.

We compared our evaluation to the State of Alabama's regulation of Eastern Technologies, Inc. (ETI), a company in Ashford, Alabama that is engaged in a similar business. The comparison, based on public information about the ETI activities, identified differences between the results of our evaluation and Alabama's regulation of ETI.

In particular, the license Alabama issued to ETI does not specify that ETI is licensed to treat and dispose of radioactive waste. If a specific waste processing license is not required for these activities, the regulatory burden and expense to engage in this business line would be significantly less than we had assumed. When UniTech evaluated a similar waste disposal business some years ago, however, the potential regulatory requirements described by the NRC staff were a significant factor in our decision not to enter that business.

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We also noted that published literature on ETI's disposal business does not contain any indication that customers who transfer contaminated garments back to ETI for processing and disposal would be subject to regulations covering the transfer of radioactive waste. If the radioactive waste transfer regulations are not applicable, the regulatory burden on customers would be lower than we had anticipated.

These differences between the results of our own analysis and the actual regulation of ETI cause us to question our results. It is important to UniTech, in conducting its evaluation, that we understand the regulatory requirements that apply to processing and disposal of soluble contaminated protective garments. Any assistance you can give us would be greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Fuller", with a long horizontal line extending to the right.

Michael R. Fuller
Manager, Health Physics and Engineering
UniTech Services Group, Inc.,

cc: file

**Principal NRC and Agreement State Requirements
for Disposal of Soluble Contaminated Clothing**

Activity	Regulatory Requirement	Entity Responsible
1. Supply protective clothing	None.	Vendor
2. Transfer contaminated clothing to service provider for disposal	Confirmation of authorized recipient (§§ 30.41(c), 40.51(c) and 70.42(c)); Waste manifest requirements (10 CFR 20.2006 and App. G.); and comparable Agreement State requirements	Customer
3. Receive contaminated clothing for treatment/disposal	Specific license for waste treatment/disposal (10 CFR 20.2001(b)(1)) or comparable Agreement State requirements; Waste manifest requirements (10 CFR 20.2006 and App. G.)	Treatment/Disposal Service Provider
4. Dissolve contaminated clothing	Specific license for waste treatment/disposal (10 CFR 20.2001(b)(1)) or comparable Agreement State requirements	Treatment/Disposal Service Provider
5. Discharge contaminated solution to sanitary sewer	Limits on solubility and amount of activity (10 CFR 20.2003); Record retention requirements (10 CFR 20.2108); and comparable Agreement State requirements	Treatment/Disposal Service Provider
6. Dispose of contaminated solid residue at licensed land disposal facility	Waste manifest requirements (10 CFR 20.2006 and App. G.); Record retention requirements (10 CFR 20.2108) or comparable Agreement State requirements	Treatment/Disposal Service Provider



TO: *Paul Lohans* *6/25/02* DATE *6/24*

FROM: **MICHAEL FULLER**
Manager, Health Physics & Engineering

☐ Information

☐ Please review and respond

☐ Please sign / initial / return

☐ Remarks:

*Please feel free to contact
me if you need any other
information regarding this
matter.*

*PHONE 413 543 6911 x25
FAX 413 543 6989
email MIKEP@ULST.COM*

- Mike

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U.S. NUCLEAR REGULATORY COMM.
MR. PAUL LOHAUS
1 WHITE FLINT NORTH
11555 ROCKVILLE PIKE
ROCKVILLE MD 20852

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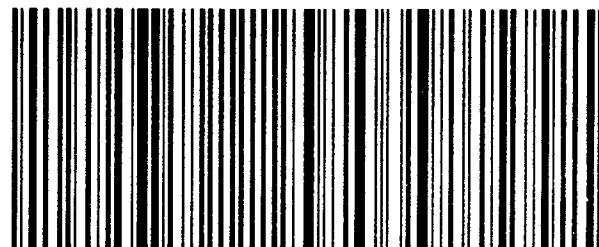
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