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October 19, 2005

Mr. Jim Schmidt  
US Nuclear Regulatory Commission  
Nuclear Materials Safety and Safeguards  
Materials Licensing Section  
475 Allendale Road  
King of Prussia, PA 19406

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MS-16

RE: License No. 37-23341-01, Mail Control No. 137582 03020934

Dear Mr. Schmidt:

Thank you for taking the time to discuss the referenced license amendment request. UniTech offers the following additional information.

UniTech proposes to evaluate the potential dose to the maximally exposed theoretical person from liquid effluents using the Pathway Analysis presented in UniTech's letter dated July 24, 1998. UniTech shall continue reporting concentration and total activity data, along with the calculated dose, as it has in the past and in accordance with License Condition 16. Further, UniTech establishes an ALARA criterion of 1 mrem/year for liquid effluents to unrestricted areas. This criterion has been selected based on a documented consensus that a 1 mrem/yr dose is sufficiently low that it does not warrant further justification.<sup>1</sup> In the unlikely event that UniTech exceed the established ALARA criterion for liquid effluents to unrestricted areas, UniTech shall initiate an ALARA justification. Such evaluation shall consider the following: engineering costs to reduce potential doses, realistic population dose projections, and the corresponding calculated cost to reduce population doses. During the evaluation, UniTech shall ensure potential doses from liquid effluents, calculated in accordance with the July 24, 1998 Pathway Analysis, are maintained below the NPDES Permit limit of 4 mrem per year.

UniTech respectfully requests that these commitments replace the requirements of License Condition 15 in their entirety. Please contact me at your earliest opportunity if you require additional information.

Sincerely,

UniTech Services Group, Inc.

Glenn Roberts  
Health Physicist

cc: Dan Neely, Plant Manager, RSO  
Mike Fuller, Manager, Health Physics and Engineering

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NMSS/RGNI MATERIALS-002

<sup>1</sup> Numerous publications noted, including the following: ANSI/HPS N13.12-1999, ICRP 60 (later BSS 115 "trivial dose" exemption = 1 mrem/yr), IAEA Safety Series 89 and 111-P-1.1, and NCRP 116. As not to be taken out of context, references do not specifically address liquid effluents but, in general, support the criterion.