



11 November 2016

Director of Nuclear Material and Safeguards
U.S. Nuclear Regulatory Commission
Attn: GLTS
Washington, DC 20555-0001

Re: Transfer of Generally Licensed devices

Dear Director,

AES, Indianapolis Power & Light is submitting the following information regarding the transfer of eight Generally Licensed devices as listed below. These sources were removed from service, packaged and shipped to RAM Services, Inc. in Two Rivers, WI on 4 November 2016.

I am requesting that Indianapolis Power & Light's inventory of Generally Licensed devices be updated to reflect the transfer of these devices and have attached a copy of leak test certificates for each unit along with the copy of the signed LLRW manifest 2016-0103 as documentation of the movement of these sources. RAM Services, Inc. State of Wisconsin license number is 071-1234-01.

Feel free to contact me at 317 829-6842 with any questions or concerns you may have. I can also be reached via email at juan.hummel@aes.com.

Sincerely,

Juan Hummel,
Environmental Coordinator

UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST SHIPPING PAPER		RAM SERVICES, INC.		5. SHIPPER - NAME AND FACILITY RAM Services, Inc. AES - Indianapolis Power & Light 3700 South Harding Street Indianapolis IN 46217		SHIPPER I.D. NUMBER 46217		7. NRC FORM 540 AND 540A PAGE 1 OF 1 PAGE(S) NRC FORM 541 AND 541A 1 PAGE(S) NRC FORM 542 AND 542A 1 PAGE(S) ADDITIONAL INFORMATION		8. MANIFEST NUMBER (Use this number on all continuation pages) 2016-0103							
1. EMERGENCY TELEPHONE NUMBER (Include Area Code) 800-424-9300		USER PERMIT NUMBER 2016-0103		SHIPMENT NUMBER 2016-0103		COLLECTOR PROCESSOR		9. CONSIGNEE - Name and Facility Address RAM Services, Inc. 510 COUNTY HIGHWAY V TWO RIVERS WI 54241		CONTACT JERRY WIZA, RPT TELEPHONE NUMBER (Include Area Code) 1-920-686-3889							
ORGANIZATION CHEMTREC [for RAM SERVICES CONTRACT 210964]		CONTACT Brad Hobbs or Jerry Wiza		TELEPHONE NUMBER 317-829-5730		EPA I.D. NUMBER NA		SIGNATURE - Authorized consignee acknowledging waste receipt <i>Jerry Wiza</i>		DATE 5 Nov 2016							
2. IS THIS AN "EXCLUSIVE USE" SHIPMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		3. TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 1		6. CARRIER - Name and Address RAM Services, Inc. 510 COUNTY HIGHWAY V TWO RIVERS WI 54241		SHIPPING DATE 4-Nov-2016		10. CERTIFICATION "This is to certify that the herein-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. This also certifies that the materials are classified, packaged, marked, and labeled and are in proper condition for transportation and disposal as described in accordance with the applicable requirements of 10 CFR Parts 20 and 61, or equivalent state regulations."									
4. DOES EPA REGULATED WASTE REQUIRING A MANIFEST ACCOMPANY THIS SHIPMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If "Yes," provide Manifest Number =====>		EPA MANIFEST NUMBER NOT APPLICABLE		CONTACT JERRY WIZA, RPT		TELEPHONE NUMBER (Include Area Code) 920-686-3889		SIGNATURE - Authorized carrier acknowledging waste receipt <i>Jerry Wiza</i>		DATE 4 Nov 2016							
11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (Including UN ID number, proper shipping name, hazard class, and any additional information)		12. DOT LABEL "RADIOACTIVE"		13. TRANSPORT INDEX		14. PHYSICAL AND CHEMICAL FORM		15. INDIVIDUAL RADIONUCLIDES		16. TOTAL PACKAGE ACTIVITY IN SI UNITS		17. LSA/SCO CLASS		18. TOTAL WEIGHT OR VOLUME (Use appropriate units)		19. IDENTIFICATION NUMBER OF PACKAGE	
UN2915, Radioactive material, type A package, 7		Yellow II		0.1		SOLID OXIDE		Ra-226 Cs-137		mCi MBq 1.21E+01 4.48E+02		NONE		231.3 510.0 7.5 Kg Lbs FT3		RPK-1213	
FOR CONSIGNEE USE ONLY										Record Waste Description Inadequate Contamination or Leakage Detected Unexpected Exposure Rates Detected Labels, Markings, etc. Inadequate Container Integrity Inadequate Other No Violations Detected on this Shipment							

CONTAINER AND WASTE DESCRIPTION

NUMBER OF
PACKAGES/
DISPOSAL
CONTAINERS

NET WASTE VOLUME	
---------------------	--

NET WASTE
WEIGHT

1. MANIFEST TOTALS

SPECIAL NUCLEAR MATERIAL (grams)

U-233

U-235

Pu

TOTAL

2. MANIFEST NUMBER

2016-0103

3 PAGE 1 OF 1

4. SHIPPER NAME

RAM Services, Inc.

SHIPPER ID NUMBER

46217

DISPOSAL CONTAINER DESCRIPTION

WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER

NOTE 1: Container Description Codes. For Containers/Waste requiring disposal in approved structural overpacks, the numerical code must be followed by "-OP."

1	Wooden Box or Crate	9	Demineralizer
2	Metal Box	10	Gas Cylinder
3	Plastic Drum or Pail	11	Bulk, Unpackaged Waste
4	Metal Drum or Pail	12	Unpackaged Components
5	Metal Tank or Liner	13	High Integrity Container
6	Concrete Tank or Liner	19	Other. Describe in Item 6,
7	Polyethylene Tank or Liner		or additional page
8	Fiberglass Tank or Liner		

NOTE 2: Waste Descriptor Codes (Choose up to three which predominate by volume.)

20. Charcoal	29. Demolition Rubble	38. Evaporator Bottoms/Sludges/Concentrates
21. Incinerator Ash	30. Cation Ion-Exchange Media	39. Compactible Trash
22. Soil	31. Anion Ion-Exchange Media	40. Noncompactible Trash
23. Gas	32. Mixed Bed Ion-Exchange Media	41. Animal Carcass
24. Oil	33. Contaminated Equipment	42. Biological Material (except animal carcass)
25. Aqueous Liquid	34. Organic Liquid (except oil)	43. Activated Material
26. Filter Media	35. Glassware or Labware	59. Other. Describe in Item 11, or additional page
27. Mechanical Filter	36. Sealed Source/Device	
28. EPA or State Hazardous	37. Paint or Plating	

NOTE 3: For solidification media that meet disposal site structural stability requirements, the numerical code must be followed by "-S". For all solidification media, the vendor (manufacturer) and brand name must also be identified in item 13.
Code 100 = NON REQUIRED.

Sorption			Solidification
60. Speedi Dri	67. Florco X	75. Petrosol II	90. Cement
61. Celeborn	68 Solid A Sorb	76. Aquaset	91. Concrete
62. Floor Dry [®]	69. Chemisil 30	77. Aquaset II	(Encapsulation)
Superfine	70. Chemisil 50	88. Other. Describe in	92. Bitumen
63. Hi Dri	71. Chemisil 3030	item 13, or additional	93. Vinyl Chloride
64. Safe T Sorb	72. Dicapen HP200	page	94. Vinyl Ester Styrene
65. Safe N Dri	73. Dicapen HP500		
66. Florco	74. Petrosol		

FORM 542		RAM SERVICES, INC.		1. WASTE COLLECTOR/PROCESSOR						2. MANIFEST NUMBER				
UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST MANIFEST INDEX AND REGION COMPACT TABULATION List all original "PROCESSED WASTE" generators (if any) before "COLLECTED WASTE" generators.				Name		SHIPPER USE ONLY				2016-0103 3 Page 1 of 1				
				RAM Services, Inc.										
				IDENTIFICATION NUMBER										
				54241										
				7 Shipping Date										
				4-Nov-2016										
4. GENERATOR IDENTIFICATION NUMBER	5. GENERATOR NAME AND TELEPHONE NUMBER	6. GENERATOR FACILITY ADDRESS	6A. WASTE DESCRIPTION (NOMENCLATURE)	7. PREPROCESSED WASTE (OR MATERIAL) VOLUME (m3) (ft3)	8. MANIFEST NUMBER(S) UNDER WHICH WASTE (OR MATERIAL) RECEIVED AND DATE OF RECEIPT	9. WASTE CODE P= PROCESSED C= COLLECTED	10. ORIGINATING COMPACT REGION OR STATE	11. AS PROCESSED/COLLECTED TOTAL		C. ACTIVITY		D. VOLUME	E. WEIGHT	F. MAXIMUM PACKAGE RADIATION LEVEL
								A. SOURCE MATERIAL (kg) (lb)	B. SNM (g)	(MBq) (mCi)	(m3) (ft3)	(pounds)	(mrem/hr)	
46217	AES - Indianapolis Power & Light 317-829-5730	3700 South Harding Street Indianapolis, IN 46217	Sealed Source/Device	0.212376 7.50		C	IN	0 0	0	4.48E+02 1.21E+01	0.212 7.50	510.00		
TOTALS OF ALL PAGES(FORMS 542 AND 542A)								0.00E+00	0.00E+00	0.00E+00	4.48E+02 1.21E+01	2.12E-01 7.50E+00	5.10E+02	



Quality Data Systems, Inc.
720 Executive Park Drive, Suite 3500 • Greenwood, IN 46143
Phone: 317-885-9025 • Fax: 317-885-9125

August 9, 2016

Juan Hummel
IPL/Harding Street
3700 South Harding Street
Indianapolis, IN 46217-333

RE: Physical Inspection and Wipe Test Results

Juan:

On August 2, 2016, I performed physical inspections of the eight (8) stationary nuclear devices located on Unit 7 at the Harding Street Station.

The physical inspections included verification the devices were in place, the identification numbers were correct, that the nuclear devices were secure, all warning signs were in place, and the shutters were operational, where applicable.

The wipe tests for leaks, which are conducted every three (3) years were also performed and forwarded to Thermo Measure Tech for analyses. The leak test results indicated removable activity of each device to be less than $2.5E-5$ uCi.

All results were satisfactory. All tests performed are in accordance with past practices and should be kept on file at your facility.

Physical tests are scheduled for February 2017 and Leak Test Wipes are scheduled for August 2019, if the sources are still on site.

If you have any questions, please contact me at (317) 885-9025.

Respectfully Submitted.

Anthony C. DeFur
Quality Data Systems, Inc

Attachments

Indianapolis Power and Light Company

Radiological Physical Inspection Report

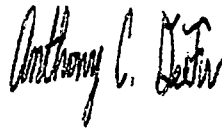
For

IPL / Harding Street Station

No.	Device Model	Device	Source	Physical Inspection Results					Date
		Serial Number	Serial Number	Isotope (mCi)	Quality	Source In Place	Shutter Operating	Performed By	
1	SECOAL	---	SE-799	RA-226	2	Yes	Yes	A.C. DeFur	8/2/16
2	SECOAL	---	SE-800	RA-226	2	Yes	Yes	A.C. DeFur	8/2/16
3	SECOAL	---	SE-801	RA-226	2	Yes	Yes	A.C. DeFur	8/2/16
4	SECOAL	---	SE-802	RA-226	2	Yes	Yes	A.C. DeFur	8/2/16
5	SECOAL	---	SE-803	RA-226	2	Yes	Yes	A.C. DeFur	8/2/16
6	RONAN	---	207502A	Cs-137	1	Yes	Yes	A.C. DeFur	8/2/16
7	RONAN	---	207502B	Cs-137	1	Yes	Yes	A.C. DeFur	8/2/16
8	RONAN	---	207502C	Cs-137	1	Yes	Yes	A.C. DeFur	8/2/16

Remarks: Next Leak Check Wipe Test scheduled for August 2019.
Next Physical Inspection scheduled for February 2017.

This is a report of the inspection of your radioisotope devices and should be retained in a permanent file. Your regulatory authority may wish to review this information.



Anthony C. DeFur
Quality Data Systems, Inc.

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID:



Product: RONAN

Model: RLL1

Serial No 207502A

Isotope: Cs-137

Activity: 0.9 mCi

Source Serial N/A15872

Location: IPL Harding Street Unit #7 Scrubber

Test Type: Lab Counting

Result: ☐ Positive

☒ Negative < 2.5E-5 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.

James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID: 

Product: RONAN

Model: RLL1

Serial No 207502B

Isotope: Cs-137

Activity: 0.9 mCi

Source Serial N/A15873

Location: IPL Harding Street Unit #7 Scrubber

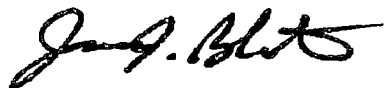
Test Type: Lab Counting

Result: ☐ Positive

☒ Negative < 2.5E-5 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.



James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID: 

Product: RONAN

Model: RLL1

Serial No 207502C

Isotope: Cs-137

Activity: 0.9 mCi

Source Serial N/A15874

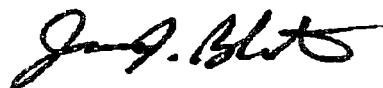
Location: IPL Harding Street Unit #7 Scrubber

Test Type: Lab Counting

Result: ☐ Positive ☒ Negative < 2.5E-5 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.



James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID:



Product: SECOAL

Model: SECOAL

Serial No SE-799

Isotope: Ra-226

Activity: 2 mCi

Source Serial SE-799

Location: HARDING STREET STATION

Test Type: Lab Counting

Result: ☐ Positive

☒ Negative < 4.0E-4 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.

James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID:



Product: SECOAL

Model: SECOAL

Serial No SE-800

Isotope: Ra-226

Activity: 2 mCi

Source Serial SE-800

Location: HARDING STREET STATION

Test Type: Lab Counting

Result: ☐ Positive

☒ Negative < 4.0E-4 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.

James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID:



Product: SECOAL

Model: SECOAL

Serial No SE-801

Isotope: Ra-226

Activity: 2 mCi

Source Serial SE-801

Location: HARDING STREET STATION

Test Type: Lab Counting

Result: ☐ Positive

☒ Negative < 4.0E-4 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.

James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID: 

Product: SECOAL

Model: SECOAL

Serial No SE-802

Isotope: Ra-226

Activity: 2 mCi

Source Serial SE-802

Location: HARDING STREET STATION

Test Type: Lab Counting

Result: ☐ Positive ☒ Negative < 4.0E-4 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.



James J. Blute
Radiation Safety Officer

LEAK TEST CERTIFICATION

Thermo
SCIENTIFIC

This is to certify that the product identified below was tested for removable contamination in accordance with Massachusetts Radioactive Material License Number: 55-0725, Condition 15.

Customer: 1130800
INDIANAPOLIS POWER & LIGHT COMPANY
Attn: John Terrel
3700 South Harding Street
Indianapolis, IN 46217 3333

Device ID:



Product: SECOAL

Model: SECOAL

Serial No SE-803

Isotope: Ra-226

Activity: 2 mCi

Source Serial SE-803

Location: HARDING STREET STATION

Test Type: Lab Counting

Result: ☐ Positive ☒ Negative < 4.0E-4 uCi

Analyzed on: August 05, 2016

This certificate should be maintained as a permanent record of the leak test of this product.

James J. Blute
Radiation Safety Officer