

SPECIAL NUCLEAR MATERIAL EXEMPTION CERTIFICATION

The Special Nuclear Material Exemption Certification form must be completed and signed by each generator certifying to the following conditions. Please attach this form and all required information to the Radioactive Waste Profile Record (EC-0230). **A completed and signed copy of this form must also accompany each waste manifest.**

Waste Stream ID: 7321-01

Manifest No. 0094

1. Check applicable category below for the waste stream:

| √ | Uranium Enrichment Percent | Weight Percent of Chemicals in Condition 2c | Weight Percent of Materials in Condition 2d | U-235 Concentration (pCi/g) | Measurement Uncertainty* (pCi/g) |
|-------------------------------------|--|---|---|-----------------------------|----------------------------------|
| <input type="checkbox"/> | < 10 % | ≤ 20 % | ≤ 1 % | ≤ 1,900 | ≤ 285 |
| <input type="checkbox"/> | Unlimited | ≤ 20 % | ≤ 1 % | ≤ 1,190 | ≤ 179 |
| <input type="checkbox"/> | Unlimited | Sum of both ≤ 45 % of waste by weight | | ≤ 680 | ≤ 102 |
| <input checked="" type="checkbox"/> | Unlimited | Unlimited | Unlimited | ≤ 26 | ≤ 10 |
| <input type="checkbox"/> | Not Applicable - Enriched U-235 is not present in the waste. | | | | |

* A concentration value is used for the maximum measurement uncertainty limit rather than a percentage value to allow greater flexibility for generators with waste having very low SNM concentrations.

2. Certify to the following requirements by checking applicable boxes, A-E for solid waste or A-F if waste includes liquid:

- ☒ a. Concentrations of SNM in individual waste containers do not exceed the applicable values listed in the above table and SNM isotope concentrations listed in Table 1.
- ☒ b. The SNM is homogeneously distributed throughout the waste or the SNM concentrations in any contiguous mass of 600 kilograms (1,323 lbs) do not exceed on average the specified limits. (Based on process knowledge or testing).
- ☒ c. Except as allowed by Condition 1, the waste does not contain “pure forms” of chemicals containing carbon, fluorine, magnesium, or bismuth in bulk quantities (e.g., a pallet of drums, a B-25 box). By “pure forms,” it is meant that mixtures of the above elements such as magnesium oxide, magnesium carbonate, magnesium fluoride, bismuth oxide, etc. do not contain other elements. (Based on process knowledge or testing).
- ☒ d. Except as allowed by Condition 1, the waste does not contain total quantities of beryllium, hydrogenous material enriched in deuterium, or graphite above one percent of the total weight of the waste. (Based on process knowledge, physical observations, or testing).
- ☒ e. Waste packages do not contain highly soluble forms of uranium greater than 350 grams of uranium-235 or 200 grams of uranium-233. If the waste contains mixtures of U-233 and U-235, the waste meets the sum of the fractions rule. Highly soluble forms of uranium include, but are not limited to: uranium sulfate, uranyl acetate, uranyl chloride, uranyl formate, uranyl fluoride, uranyl nitrate, uranyl potassium carbonate, and uranyl sulfate. (Based on process knowledge or testing).
- ☐ f. For containers of liquid waste with more than 600 kilograms of waste, the total activity (pCi) of SNM in the manifested container does not exceed the SNM concentration in the above table or Table 1 times 600 kilograms of waste (based on process knowledge or testing). For example, the maximum activity of Pu-239 in any manifested container of liquid waste is 6.0 mCi (6.0E+09 pCi) as shown below:

$$10,000 \frac{\text{pCi}}{\text{g}} \times 600,000 \text{ g} = 6.0 \times 10^9 \text{ pCi} = 6.0 \text{ mCi Pu-239}$$

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Table 1. Maximum concentrations of SNM in individual waste containers (refer to above table for U-235 limits).

| Radionuclide | Maximum Concentration (pCi/g) | Measurement Uncertainty (pCi/g) | Radionuclide | Maximum Concentration (pCi/g) | Measurement Uncertainty (pCi/g) |
|--------------|-------------------------------|---------------------------------|--------------|-------------------------------|---------------------------------|
| U-233 | 75,000 | 11,250 | Pu-241 | 350,000 | 50,000 |
| Pu-236 | 500 | 75 | Pu-242 | 10,000 | 1,500 |
| Pu-238 | 10,000 | 1,500 | Pu-243 | 500 | 75 |
| Pu-239 | 10,000 | 1,500 | Pu-244 | 500 | 75 |
| Pu-240 | 10,000 | 1,500 | | | |

3. Indicate that the following information is attached to the Radioactive Waste Profile Record by checking each box. (Note: Only the two-page Special Nuclear Material Exemption Certification form needs to be included with each manifest).

- ☒ a. Provide a description of how the waste was generated, list the physical forms in the waste, and identify the uranium chemical composition.
- ☒ b. Provide a general description of how the waste was characterized (including the volumetric extent of the waste, and the number, location, type, and results of any analytical testing), the range of SNM concentrations, and the analytical results with error values used to develop the concentration ranges.
- ☒ c. Describe the process by which the waste was generated showing that the spatial distribution of SNM must be uniform, or other information supporting spatial distribution.
- ☒ d. Describe the methods to be used to determine the concentrations on the manifests. These methods could include direct measurement and the use of scaling factors. Describe the uncertainty associated with sampling and testing used to obtain the manifest concentrations.

4. Generator's certification of compliance with the SNM exemption: I certify that the information provided on this form is complete, true, and correct and is based on process knowledge, physical observations, or approved laboratory testing. I also certify that sampling and radiological testing of waste containing SNM was performed in accordance with EnergySolutions' Radioactive Material License and that any supporting documentation and analytical results have been submitted to EnergySolutions.

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| | W Wade Fillingame Jr | Sr. Broker | 8/3/2017 |
| Authorized Signature | Printed Name | Title | Date |