



June 20, 2022

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

Dear Director,

Graphic Packaging International - Battle Creek Mill ("GPI") is writing this letter to notify your agency of the transfer of four, Generally Licensed devices identified as being in our possession. Detailed information for each unit is described below. The devices were received by RAM Services, Inc. of Two Rivers, Wisconsin on June 4, 2022. The RAM Services state of Wisconsin radioactive materials license number is 071-1234-01.

Manufacturer	Model #	Serial #	Isotope	Activity (mCi)	Assay Date
Measurex Corp.	2201 SIF.D2	1035BG	Sr-90	50	8/1/1996
Honeywell, Intl.	4201 KAC.D5	SO120	Kr-85	400	4/1/2010
Honeywell, Intl.	2201 SIF.D2	0247BG	Sr-90	50	6/1/1988
Honeywell, Intl.	4201 KAC.D5	SO119	Kr-85	400	4/1/2010

Attached is a copy of RAM Services, Inc. acceptance letter dated June 4, 2022, as documentation of their acceptance and transfer of the above units. Also enclosed are the most current leak test certificates for the two, Sr-90 devices documenting neither source had contamination exceeding to 0.005 uCi limits. We are requesting you update our Generally Licensed device inventory accordingly and terminate our registration as these were the only GL devices in our possession.

Feel free to contact me by phone at 470-792-5469 or email at Furqan.Shaikh@graphicpkg.com with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Furqan Shaikh", written in a cursive style.

Furqan Shaikh
Director, Corporate HSE
Graphic Packaging International, LLC

Attachments



RAM Services, Inc.
510 County Highway V
Two Rivers, WI 54241-9628
Voice: 920-686-3889
jwiza@ramservicesinc.com
www.ramservicesinc.com

4 June 2022

Mr. Joe McCotter,
Graphic Packaging International, Inc. – Battle Creek Mill
79 East Fountain Street
Battle Creek, MI 49017

Re: RPK-1920, Shipment 2022-048

Dear Mr. McCotter,

This letter is to advise you the radioactive devices as detailed below have been received by RAM Services, Inc. as of 4 June 2022 and we have taken possession of them under our state of Wisconsin Radioactive Materials License 071-1234-01.

Manufacturer	Model #	Serial #	Isotope	Activity (mCi)	Assay Date
Measurex Corp.	2201 SIF.D2	1035BG	Sr-90	50	8/1/1996
Honeywell, Intl.	4201 KAC.D5	SO120	Kr-85	400	4/1/2010
Honeywell, Intl.	2201 SIF.D2	0247BG	Sr-90	50	6/1/1988
Honeywell, Intl.	4201 KAC.D5	SO119	Kr-85	400	4/1/2010

The two, Sr-90 sources shall be disposed of as Low-Level Radioactive Waste at the Waste Control Specialists site in Andrews, TX. RAM Services will manifest them using an U.S. Nuclear Regulatory Commission 540/541 waste manifest, naming Graphic Packaging International, Inc. – Battle Creek Mill as the last beneficial user and waste generator of record.

Final disposal activities, volumes and isotopes as indicated on the 541 waste manifest shall be sent electronically along with a copy of the Waste Control Specialists acceptance letter once received from the disposal site at a later date.

The two, Kr-85 sources have been transferred to our license and we shall remove the source capsules from the devices and send out to our vendor for recycling.

Please retain this record in your permanent files and feel free to contact me with any questions or concerns you may have. I can also be reached via email at jwiza@ramservicesinc.com or my cell phone at 920 323-6993.

Sincerely,

A handwritten signature in black ink that reads 'Jerry P. Wiza'.

Jerry P. Wiza, President

Serena Conour
OnCare Digital Assets, Inc.
224 W Campbell Rd, Suite 452
Dallas, TX 75080



Graphics Packaging International
79 E. Fountain St.
Battle Creek, MI 49017

August 16, 2021

**RESULTS OF RADIATION SAFETY TESTS OF SENSORS
FOR CONTRACT 4132 CYCLE 7/2021**

Model	Serial	Isotope	Installed?	Powered?	Test date	Leak test	Survey profile	Technician
PM1								
4201	SO119	Kr-85	Yes	Yes	7/15/2021	Not required	Not required	Bill Schenher
2201	0247BG	Sr-90	Yes	Yes	7/15/2021	7/15/2021	Not required	Bill Schenher
PM2								
4201	SO120	Kr-85	Yes	Yes	7/15/2021	Not required	Not required	Bill Schenher
2201	1035BG	Sr-90	Yes	Yes	7/15/2021	7/15/2021	Not required	Bill Schenher

A test for leakage of radioactive material was performed on any source above that is a solid isotope. Leak test analysis indicated no radioactive material in excess of 0.005 microcuries was found. If power was applied to the gauge, the radiation warning lights and/or indicators, shutter (on-off) mechanism, and applicable radiation safety interlocks were tested and found to be functioning correctly on the date of this test.

This test was performed in accordance with the provisions of OnCare Digital Assets Inc Specific License Number L07001, issued by the State of Texas.

Contact the OnCare Digital Assets representative or the OnCare Digital Assets RSO for additional information regarding this test.

A handwritten signature in cursive script, appearing to read "Serena Conour".

Serena Conour
Corporate Radiation Safety Officer

CC: Larry Wheeler Sr., Business Manager, larry.wheeler@oncareda.com
Bill Schenher, Senior Systems Specialist, schenher@oncareda.com

Attachments: Meter Certificate of Calibration, S/N 318278
Bill Schenher's Certificate of Authorization to Perform Radiological Work



CERTIFICATE OF CALIBRATION

State of Wisconsin Radioactive Materials License 071 - 1234 - 01

RAM SERVICES, INC.
510 COUNTY HIGHWAY V
TWO RIVERS, WISCONSIN 54241
VOICE: 1-920-686-3889
WWW.RAMSERVICESINC.COM

CLIENT TSP ONCARE DIGITAL ASSETS INC		CLIENT INSTRUMENT ID 4021	CALIBRATION ID. 1365
INSTRUMENT		DETECTOR	CALIBRATION DATE 10 February 2021
MANUFACTURER LUDLUM	MANUFACTURER Ludlum		NEXT CALIBRATION DUE 10 February 2022
MODEL 3	MODEL 44-7		TEMPERATURE 73 deg F
SERIAL NUMBER 318278	SERIAL NUMBER PR 349262		RELATIVE HUMIDITY 20 %
TYPE Analog/ Linear	TYPE GM End Window		PRESSURE 30.37 in Hg

Pre-calibration Instrument Inspection & Adjustments						
OK	Operating	No	Requires Repair	N / A	Window Operation	High voltage 898
OK	Mechanical	OK	Reset checked	N / A	Alarm	Threshold -30.1
OK	Fast/Slow response	N / A	Alarm setting	N / A	Autoscale	Battery Minimum 1.25
OK	Meter Zeroed	OK	Audio/speaker	Calibration within 10%?	Yes	Battery reading 1.7
Comments						

Calibration Geometry	
External Detectors	Internal Detectors
Orientation to Field: Perpendicular to field	Orientation to Field: Perpendicular to field
Shield: NA	Reference Point: None

Calibration Measurements and Results								
LOWER RANGE					UPPER RANGE			
SCALE	AS FOUND	CALIBRATION POINT	POST CALIBRATION	CORRECTION FACTOR	AS FOUND	CALIBRATION POINT	POST CALIBRATION	CORRECTION FACTOR
0.2	0.07	0.08	0.07	1	0.16	0.16	0.16	1
2	0.4	0.4	0.4	1	1.60	1.6	1.60	1
20	4.	4	4	1	16.0	16	16.0	1
200	44	40	44	1	165	160	165	1
CHECK SOURCE SN ISOTOPE INSTRUMENT READING								
Cs-7A		Cs-137	5	100,000	CPM			

Methods and Certification	
Calibrated in accordance with the indicated Procedure. These procedures conform to ANSI Standard N323A-1997.	RAMSOP 300-300
XDose rate calibrations use a J.L. Shepherd Model 28-6A Serial # 10001 source with a Certified Activity of 1200 mCi Cs-137	Pulse rate calibrations use a Ludlum Model 500-2 Serial # 203342 Pulse Rate Calibrator
Calibrated by	DATE
<i>Rick Parlato</i>	10 February 2021

Serena Conour
Corporate Radiation Safety Officer
OnCare Digital Assets, Inc.
17177 Preston Road, Suite 325
Dallas, TX 75248
rso@oncareda.com
Cell: 214-814-2611
Fax: 866-239-4340



2021

CERTIFICATION OF AUTHORIZATION TO PERFORM RADIOLOGICAL WORK

This document certifies that **Bill Schenher** has completed the required training and is authorized by OnCare Digital Assets Inc Specific License Number L07001 (issued by Texas), in combination with the license granted by 10CFR31.6 or its agreement state equivalent, and/or by applicable X-ray service registration to perform routine and corrective maintenance to include periodic testing of radiation safety interlocks and collection of survey profiles and leak test samples, when applicable, involving industrial sealed source nuclear and x-ray devices.

THE FOLLOWING RESTRICTIONS APPLY:

Specific authorization must be requested and granted by the RSO for each instance of work. The RSO has the authority to deny work if it is deemed unsafe or is not a licensed activity. Assigned dosimetry shall be worn for all work performed.

This certificate is effective from 1/11/2021 through 12/31/2021 and is valid only while Bill Schenher is employed by OnCare Digital Assets, Inc. and remains on the list of authorized employees maintained by the OnCare Digital Assets, Inc. Radiation Safety Office. Authorization may be confirmed by contacting that office.

A handwritten signature in cursive script, appearing to read "Serena Conour".

Serena Conour
Corporate Radiation Safety Officer

Serena Conour
OnCare Digital Assets, Inc.
1850 N Greenville, Ave, Suite 157
Richardson, TX 75081



Mike Baker
Graphics Packaging International
79 E. Fountain St.
Battle Creek, MI 49017
Mike.Baker@graphicpkg.com

January 12, 2022

**RESULTS OF RADIATION SAFETY TESTS OF SENSORS
FOR CONTRACT 4132 CYCLE 12/2021**

Model	Serial	Isotope	Installed?	Powered?	Test date	Leak test	Survey profile	Technician
PM1								
4201	SO119	Kr-85	Yes	Yes	12/23/2021	Not required	Not required	Bill Schenher
2201	0247BG	Sr-90	Yes	Yes	12/23/2021	12/23/2021	Not required	Bill Schenher
PM2								
4201	SO120	Kr-85	Yes	Yes	12/23/2021	Not required	Not required	Bill Schenher
2201	1035BG	Sr-90	Yes	Yes	12/23/2021	12/23/2021	Not required	Bill Schenher

A test for leakage of radioactive material was performed on any source above that is a solid isotope. Leak test analysis indicated no radioactive material in excess of 0.005 microcuries was found. If power was applied to the gauge, the radiation warning lights and/or indicators, shutter (on-off) mechanism, and applicable radiation safety interlocks were tested and found to be functioning correctly on the date of this test.

This test was performed in accordance with the provisions of OnCare Digital Assets Inc Specific License Number L07001, issued by the State of Texas.

Contact the OnCare Digital Assets representative or the OnCare Digital Assets Environmental, Health, and Safety Manager for additional information regarding this test.

A handwritten signature in black ink, appearing to read "Serena Conour".

Serena Conour
Environmental, Health, and Safety Manager

CC: Larry Wheeler Sr., Business Manager, larry.wheeler@oncareda.com
Bill Schenher, Senior Systems Specialist, schenher@oncareda.com

Attachments: Meter Certificate of Calibration, S/N 309705
Bill Schenher's Certificate of Authorization to Perform Radiological Work



CERTIFICATE OF CALIBRATION

State of Wisconsin Radioactive Materials License 071 - 1234 - 01

RAM SERVICES, INC.
510 COUNTY HIGHWAY V
TWO RIVERS, WISCONSIN 54241
VOICE: 1-920-686-3889
WWW.RAMSERVICESINC.COM

CLIENT TSP ONCARE DIGITAL ASSETS INC		CLIENT INSTRUMENT ID 4061	CALIBRATION ID. 1428
INSTRUMENT		DETECTOR	CALIBRATION DATE
MANUFACTURER Ludlum		MANUFACTURER Ludlum	24 August 2021
MODEL 3		MODEL 44-7	NEXT CALIBRATION DUE 24 August 2022
SERIAL NUMBER 309705		SERIAL NUMBER PR339507	TEMPERATURE 77 deg F
TYPE Analog / Linear		TYPE 44-7 end window, halogen quenched GM	RELATIVE HUMIDITY 76 %
			PRESSURE 29.90 in Hg

Pre-calibration Instrument Inspection & Adjustments							
OK	Operating	No	Requires Repair	N / A	Window Operation	High voltage	896
OK	Mechanical	OK	Reset checked	N / A	Alarm	Threshold	-32.5
OK	Fast/Slow response	N / A	Alarm setting	N / A	Autoscale	Battery Minimum	2.6K
OK	Meter Zeroed	OK	Audio/speaker	Calibration within 10%?	Yes	Battery reading	SAT
Comments							

Calibration Geometry	
External Detectors	Internal Detectors
Orientation to Field: in line with field	Orientation to Field: N / A
Shield: NA	Reference Point: None

Calibration Measurements and Results								
LOWER RANGE					UPPER RANGE			
SCALE	AS FOUND	CALIBRATION POINT	POST CALIBRATION	CORRECTION FACTOR	AS FOUND	CALIBRATION POINT	POST CALIBRATION	CORRECTION FACTOR
0.2	0.04	0.04	0.04	1	0.16	0.16	0.16	1
2	0.4	0.4	0.4	1	1.60	1.6	1.60	1
20	4.	4	4	1	16.0	16	16.0	1
200	40	40	40	1	160	160	160	1
CHECK SOURCE SN		ISOTOPE		INSTRUMENT READING				
Cs-7A		Cs-137		5 MICROCI 140,000 CPM				

Methods and Certification	
Calibrated in accordance with the Indicated Procedure. These procedures conform to ANSI Standard N323A-1997.	RAMSOP 300-300
XDose rate calibrations use a J.L. Shepherd Model 28-6A Serial # 10001 source with a Certified Activity of 1200 mCi Cs-137	Pulse rate calibrations use a Ludlum Model 500-2 Serial # 203342 Pulse Rate Calibrator
Calibrated by	DATE
<i>Rick Parlato</i>	24 August 2021

Serena Conour
Environmental, Health, and Safety Manager
OnCare Digital Assets, Inc.
1850 North Greenville Ave, Suite 157
Richardson, TX 75081
rso@oncareda.com
Cell: 214-814-2611
Fax: 866-239-4340



2022

CERTIFICATION OF AUTHORIZATION TO PERFORM RADIOLOGICAL WORK

This document certifies that **Bill Schenher** has completed the required training and is authorized by OnCare Digital Assets Inc Specific License Number L07001 (issued by Texas), in combination with the license granted by 10CFR31.6 or its agreement state equivalent, and/or by applicable X-ray service registration to perform routine and corrective maintenance to include periodic testing of radiation safety interlocks and collection of survey profiles and leak test samples, when applicable, involving industrial sealed source nuclear and x-ray devices.

THE FOLLOWING RESTRICTIONS APPLY:

Specific authorization must be requested and granted by the Environmental, Health, and Safety Manager for each instance of work. The Environmental, Health, and Safety Manager has the authority to deny work if it is deemed unsafe or is not a licensed activity. Assigned dosimetry shall be worn for all work performed.

This certificate is effective from 12/23/2021 through 12/31/2022 and is valid only while Bill Schenher is employed by OnCare Digital Assets, Inc. and remains on the list of authorized employees maintained by the OnCare Digital Assets, Inc. Environmental, Health, and Safety Office. Authorization may be confirmed by contacting that office.

A handwritten signature in black ink, appearing to read "Serena Conour". The signature is fluid and cursive.

Serena Conour
Environmental, Health, and Safety Manager