

**UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF RADIATION CONTROL  
RADIOACTIVE MATERIAL LICENSE**

Pursuant to Utah Code Ann. Title 19, Chapter 3 and the Radiation Control Rules, Utah Administrative Code R313, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material designated below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This licensee is subject to all applicable rules, and orders now or hereafter in effect and to any conditions specified below.

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LICENSEE

1. Name Cavanagh Services Group Inc.

2. Address 180 South 300 West, Suite 290  
Salt Lake City, UT 84101

) 3. License Number UT 1800510

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) 4. Expiration Date  
) May 31, 2013

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) 5. License Category – 4-c

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6. Radioactive material (element and mass number)

7. Chemical and/or physical form

8. Maximum quantity licensee may possess at any one time

A. Any radioactive material, except source material or special nuclear material.

A. Prepackaged Waste

A. Not to exceed 37 gigabecquerels (1 curies) per radionuclide and 74 gigabecquerels (2 curies) total.\*

B. Source Material, not including special nuclear material.

B. Prepackaged Waste

B. Not to exceed 37 gigabecquerels (1 curies) per radionuclide and 74 gigabecquerels (2 curies) total.\*

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| <p>C. Special nuclear material:</p> <ul style="list-style-type: none"><li>(1) Uranium-233</li><li>(2) Uranium-235</li><li>(3) Pu-238</li><li>(4) Pu-239</li><li>(5) Pu isotopes other than Pu-238 or Pu-239</li></ul> | <p>C. Prepackaged Waste</p> | <p>C. Not to exceed</p> <ul style="list-style-type: none"><li>(1) 7.03 gigabecquerels (190 millicuries)</li><li>(2) 2.72 megabecquerels (73.5 microcuries)</li><li>(3) 37 gigabecquerels (1 curies)</li><li>(4) 37 gigabecquerels (1 curies)</li><li>(5) 37 gigabecquerels (1 curies)</li></ul> <p>or any combination of items 6C(1)-6C(5) such that the sum of their ratios does not exceed unity.*</p> |
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\* See License Condition 14 for additional restrictions on limits of possession.

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9. AUTHORIZED USE

- A. through C. Prepackaged radioactive waste may be received, placed in an overpack, prepared for shipment and transported for disposal purposes only. Disposal of radioactive waste may only be by transfer to a radioactive waste disposal facility licensed by the Executive Secretary, an Agreement State or the Nuclear Regulatory Commission.
- A. through C. Possession of radioactive material, in Utah, as a result of incidental contamination in or on shipping containers or conveyances owned or leased by Cavanagh Services Group Inc.

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CONDITIONS

- 10. A. Prepackaged radioactive waste shall be used only at temporary jobsites of the licensee anywhere in the State of Utah where the Division maintains jurisdiction.
- B. Possession of radioactive material, in Utah, as a result of incidental contamination in or on shipping containers or conveyances owned or leased by Cavanagh Services Group Inc. shall only be authorized at the EnergySolutions, Clive, Utah area, within Section 32, Township 1 South and Range 11 West, Tooele County, Utah and at the Aragonite, Utah area, South of Interstate-80, southwest of Exit 56 approximately 3 miles on the north side of the Union Pacific rail line. This license does not authorize Cavanagh Services Group Inc. to store radioactive waste for decay. This license does not authorize Cavanagh Services Group Inc. to decontaminate shipping containers or conveyances.

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11. The licensee shall comply with the provisions of R313-18, "Notices, Instructions and Reports to Workers, by Licensees or Registrants--Inspections" and R313-15, "Standards for Protection Against Radiation."
12. Prepackaged radioactive waste may be received and/or transferred only by, or under the supervision of, the Radiation Safety Officer or individuals who have satisfactorily completed the training program as specified in the licensee's application dated December 21, 2007, and letter dated April 7, 2008, and who have been designated by the Radiation Safety Officer in writing. The licensee shall maintain records, including training records, of individuals, who have been so designated, at the address listed in Item 2 of this license, for review by representatives of the Executive Secretary.
13. The Radiation Safety Officer for the activities authorized by this license is Andrew E. Drom.
14. The licensee shall not possess more than 1664 cubic feet of material containing radioactive waste.
15. Possession of radioactive material, in Utah, as a result of incidental contamination exceeding NRC Regulatory Guide 1.86 limits, in or on shipping containers or conveyances shall not exceed 20 days for any particular shipping container or conveyance. The licensee shall maintain records of receipt, possession, survey and transfer of incidental contamination. These records shall be maintained in a form that provides ready verification that the authorized possession limits and Conditions of the license are not exceeded. The licensee shall maintain these records at the address listed in Item 2 of this license, for three years from the date of the record, for review by representatives of the Executive Secretary. This license does not authorize Cavanagh Services Group Inc. to perform decommissioning or decontamination activities. This license does not authorize Cavanagh Services Group Inc. to isolate and/or mitigate spills that may occur during the transfer of prepackaged waste into overpacks.
16. The licensee shall maintain records of receipt, possession, disposal and transfer of all packaged radioactive waste material. These records shall be maintained in a form that provides ready verification that the authorized possession limits and Conditions of the license are not exceeded. The licensee shall maintain these records at the address listed in Item 2 of this license, for three years from the date of the record, for review by representatives of the Executive Secretary.
17. The licensee shall only receive radioactive waste from waste generators who have complied with the requirements of R313-15-1006(3).
18. The licensee may transport, but may not be the shipper of, licensed materials requiring transport in Type B packages without registering with the U.S. Nuclear Regulatory Commission as a user of the Type B package and having an approved Quality Assurance Program in accordance with 10 CFR 71.

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19. For instances where the licensee possesses radioactive materials as the shipper during transport, the licensed materials must remain on the licensee's inventory until the licensed materials are accepted at an authorized waste disposal site or to a licensee who is authorized to receive the radioactive material.
20. When involved in the transfer of waste for disposal, the licensee shall comply with the requirements specified in Section III of Appendix G to 10 CFR 20.1001 to 20.2402.
21. The possession of prepackaged radioactive waste is limited by the following conditions:
  - A. Possession is limited to interim periods prior to overpack, and instances where the licensee possesses radioactive material as the shipper during transport;
  - B. Radioactive waste shall be in strong outside containers or conveyances meeting all requirements of 49 CFR 171.8;
  - C. Radioactive waste shall be packaged so as to meet all U.S. Department of Transportation packaging requirements applicable during transportation; and
  - D. Radioactive waste may not be repackaged by the licensee.
22. The licensee shall not dispose of any radioactive waste via the sanitary sewer system.
23. The licensee shall not incinerate any radioactive waste for purposes of treatment or disposal.
24. The licensee may transport licensed material or deliver licensed material to a carrier for transport only in accordance with the provisions of R313-19-100, "Transportation."
25. The licensee shall notify the Executive Secretary in writing when the licensee decides to permanently discontinue activities involving materials authorized under the license and shall report the disposition of licensed material to the Executive Secretary.
26. The licensee shall maintain records of information important to safe and effective decommissioning at the location specified in Item 2 of this license, for review by representatives of the Executive Secretary, in accordance with the provisions of R313-22-35(7) until this license is terminated by the Executive Secretary.
27. Pursuant to R313-22-35(5), the licensee shall review its decommissioning funding plan [statement of intent pursuant to R313-22-35(6)(d) and cost estimate] and submit to the Executive Secretary, any necessary adjustments to the statement of intent and cost estimate, as directed by the Executive Secretary.

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28. Except as specifically provided otherwise, by this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Utah Radiation Control Rules shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the rules.

- A. Application dated December 21, 2007 [LA# 289-2007]
- B. Letter dated March 6, 2008 [LA# 289-2007]
- C. Facsimile transmittal dated March 19, 2008 [LA# 289-2007]
- D. Letter dated April 7, 2008 [LA# 289-2007]
- E. Electronic Mail dated April 9, 2008 [LA# 289-2007]
- F. Letter dated April 17, 2008 [LA# 289-2007]
- G. Letter dated April 18, 2008 [LA# 289-2007]
- H. Letter dated April 21, 2008 [LA# 289-2007]

UTAH RADIATION CONTROL BOARD

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Date

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Dane L. Finerfrock, Executive Secretary