



State of Utah  
Department of  
Environmental Quality

Richard W. Sprott  
*Executive Director*

Division of Radiation Control  
Dane L. Finerfrock  
*Director*

JON M. HUNTSMAN, JR.  
*Governor*

GARY HERBERT  
*Lieutenant Governor*

June 17, 2008

Andrew E. Drom, Radiation Safety Officer  
Cavanagh Services Group Inc.  
180 South 300 West, Suite 290  
Salt Lake City, Utah 84101

RE: Radioactive Material License Number UT 1800510,  
License Action Number 289-2007

Dear Mr. Drom:

Please find enclosed your Radioactive Material License No. UT 1800510. You should carefully review the license and familiarize yourself with all of its provisions and requirements. Please note that your application and other documents submitted to us have been incorporated into your license and are, therefore, legal requirements. It is our view that the requirements of your license and the applicable rules are reasonable and necessary to protect the radiation worker and the public. The Division expects management attention to the radiation safety program and a high standard of compliance with Division requirements. You will be inspected to verify that requirements have been met. Action will be taken on those licensees who fail to control their licensed program and allow significant violations to occur.

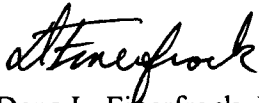
Please note that under the "RE:" paragraph of this letter, above, a license action number is referenced. This number is a number used by the Division to track licensing actions. The last Condition of the enclosed Radioactive Material License will reference the license action number (shown in parenthesis after the document) that was assigned to your license request when the Division first received your request. This added information will help both you and the Division to track changes made to your license by showing which documents refer to each specific request. In the future, if you have any question about a particular request to change your license, please reference the licensing action number regarding the request when contacting the Division.

Please contact us if you have any questions concerning the license or the requirements of Utah State Rules. You may download copies of the Utah Radiation Control Rules (Rules) and Form DRC-04 from the Utah Division of Radiation Control website. The URL is <<http://www.radiationcontrol.utah.gov>>. On the left side of the page you will see three groups of links. The links to find the Rules and Form DRC-04 are found under the third group of links entitled, "Information." These documents should assist you in beginning your program. You must maintain updated versions of these documents in the future; therefore you will need to visit the website periodically to see if there have been updates to the Rules or Forms.

You should contact the Division if you change your address or permanent place of use of licensed material, as an amendment to your license may be required. It is important that we be able to contact you by telephone and mail you certain documents pertaining to your licensed program.

We wish you every success in your program utilizing this license.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dane L. Finerfrock".

Dane L. Finerfrock, Executive Secretary  
Utah Radiation Control Board

Enclosure

**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	)	3. License Number UT 1800510
	)	)*****
1. Name Cavanagh Services Group Inc.	)	4. Expiration Date
	)	June 30, 2013
2. Address 180 South 300 West, Suite 290	)	)*****
Salt Lake City, UT 84101	)	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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|--|----------------------|--|
| C. Special nuclear material:<br>(1) Uranium-233<br>(2) Uranium-235<br>(3) Pu-238<br>(4) Pu-239<br>(5) Pu isotopes other than<br>Pu-238 or Pu-239 | C. Prepackaged Waste | C. Not to exceed<br>(1) 7.03 gigabecquerels (190<br>millicuries)<br>(2) 2.72 megabecquerels<br>(73.5 microcuries)<br>(3) 37 gigabecquerels<br>(1 curies)<br>(4) 37 gigabecquerels<br>(1 curies)<br>(5) 37 gigabecquerels<br>(1 curies)<br>or any combination of items<br>6C(1)-6C(5) such that the sum<br>of their ratios does not exceed<br>unity.* |
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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. Prepackaged radioactive waste may be transferred to a licensee who is authorized to receive the radioactive material or disposal of radioactive waste may 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 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 and cost estimate, and submit to the Executive Secretary any necessary adjustments, at intervals not to exceed 3 years or 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]
  - I. Letter dated June 3, 2008 [LA# 289-2007]

UTAH RADIATION CONTROL BOARD

Date June 17, 2008

  
Dane L. Finerfrock, Executive Secretary

