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August 29, 2005

Mr. John D. Kinneman, Chief  
Nuclear Materials Licensing Section  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

NH583

03020934

Re: Amendment Request – Radioactive Materials License Number 37-23341-01

Dear Mr. Kinneman:

License Condition 15, of Amendment No. 22, of the referenced license limits water effluents to a small fraction of Federal Regulations. UniTech's annual discharge is limited to an amount that would not result in a CEDE of 4 millirem by its NPDES Permit. Demonstration of compliance with this dose limitation is in accordance with the pathway analysis performed by UniTech and submitted to the NRC and PADEP. Quarterly reports have demonstrated that projected maximum theoretical doses resulting from UniTech water effluent are a small fraction of the 4 millirem annual limit. As this limit is 4% of the limit for dose to members of the public, UniTech feels that no other restriction is necessary. Accordingly, UniTech respectfully requests removal of License Condition 15.

In the event that the NRC will not approve UniTech's request, as stated above, UniTech requests that tritium be added to the list of nuclides in License Condition 15.B. Tritium, in the form of tritiated water, can not be removed by UniTech's current wastewater treatment system, or by any additional treatment system currently available known to UniTech. Each curie of tritium discharge annually results in a dose of  $5.05 \times 10^{-5}$  millirem under the accepted pathway analysis. This dose is not statistically distinguishable from background radiation and dose not present any increased health risk.

If you have any questions regarding this information, please do not hesitate to contact me directly at 610-948-9700, extension 19. Thank you for your assistance in this matter.

Sincerely,

Glenn Roberts  
Health Physicist  
UniTech Services Group, Inc.

cc: Mike Fuller, Manager, Health Physics and Engineering  
Dan Neely, UniTech Royersford, Plant Manager/RSO

137582

NMCC/ROM MATERIALS-002

This is to acknowledge the receipt of your letter/application dated

8/29/2005, and to inform you that the initial processing which includes an administrative review has been performed.

☒ AMEND- 37-23341-00  
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

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A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 137582.  
When calling to inquire about this action, please refer to this control number.  
You may call us on (610) 337-5398, or 337-5260.