

Broadcom
4380 Ziegler Road
Fort Collins, CO 80525
broadcom.com

Jeff Walls
EHS Dept
970.443.9063
jeff.walls@broadcom.com



To: Director of NMSS

Attn: ~~GLTS~~ U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

From: Jeff Walls

Subject: Tritium Exit Sign Disposal 1/7/2021

In fulfillment of the requirements of 10 CFR 31.5 (c) 8, we hereby notify you that on 1/7/2021 we transferred the self-luminous exit signs listed on the attached spreadsheet to SRB Technologies Inc. 2580 Landmark Dr, Winston-Salem, NC 27103 North Carolina License # 034-0534-2. As required, for each sign listed on the spreadsheet, we include the name of the manufacturer, model number, and serial number.

If you should have any questions, please contact Jeff Walls (970-443-9063).

Sincerely,

Jeff Walls

Encl.



TritiumDisposal.com
950 Taylor Station Rd, Suite O
Gahanna, OH 43230
P: 866-540-8588
F: 614-863-0622

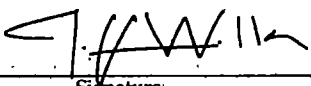
Exit Sign Return Agreement

Thank you for choosing TritiumDisposal to dispose of your tritium exit signs. Our mission is to educate businesses about the legal and environmental consequences of discarding expired tritium exit signs in trash or waste sites and to provide the necessary procedures to make their proper disposal as safe and easy as possible. In this effort, TritiumDisposal requires that certain procedures be followed during the returns process. These procedures pertain to preparing the signs for shipment, reporting damaged signs prior to shipping, completing the required paperwork, and the proper packaging of the signs. Failure to follow these procedures will result in additional fees. Please refer to the attached packaging instructions and fee schedule.

Our goal is to provide all of our customers with a cost effective outlet for the disposal of tritium exit signs. The procedures listed below help us keep our costs as low as possible and avoid increasing disposal fees to our customers. These procedures also ensure that all shipments follow all regulation of the US NRC and DOT. Please read and follow these procedures. If you have questions please don't hesitate to contact us at any time, we will be happy to work with you to ensure you don't incur additional charges.

Every page of this document, including this page, must be returned in order to receive an RGA number. In addition each page must either be signed or initialed as indicated at the bottom of each page. TritiumDisposal cannot issue an RGA number until we receive each page and they have been signed or initialed as indicated.

By signing and initialing these forms you agree that failure to follow all policies and procedures may result in shipments being returned and/or additional charges. TritiumDisposal cannot issue a Certificate of Disposal or other documentation until all fees are paid.

Jeff Walls	Industrial Hygienist	(970)-443-9063
_____ Name	_____ Title	_____ Phone#
Broadcom	4380 Ziegler Road, Fort Collins, CO 80525	
_____ Company Name	_____ Address	
 _____ Signature		12/09/20 _____ Date



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Packaging Instructions

For the Return of Self-Luminous Exit Signs

• STEP 1: Prepare Signs for Packaging

Remove any mounting brackets, hardware, screws, or tape and wipe down each sign. We do not expect the signs to be cleaned to a like-new condition, but ask that any loose material be removed.

Failure to comply: \$50 Fee, per sign

Double-faced signs made by connecting two signs back-to-back separated from each other and shipped as two signs. Signs that say exit on both sides but are contained within a single housing should be left intact. However, these signs should be counted as two signs for pricing and packaging purposes. This will apply even if there is only one serial number on the housing.

Failure to comply: \$50 Fee, per sign

If any of the signs are damaged, TritiumDisposal must be notified in writing prior to shipping. Please provide photos and a written description of the damage. The information we are looking for includes: Has the sign been damaged to the point that the light sources are accessible? Are any lights loose, missing, no longer glowing, or broken? We will use the information you provide to determine whether the damaged sign disposal price applies and what additional packaging may be required.

Damaged sign disposal price: \$250 per sign

Failure to report damaged signs: \$300 Fee, per sign (in addition to the damaged sign disposal price)

• STEP 2: Create an Inventory

Before you package your signs, create a sign inventory using our Serial Number Log (pg 6). Each sign's manufacturer name, manufacture date, model number, serial number, and activity (measured in Ci or TBq) can be found on the back or side of each sign. If any information is not available for a sign, you may mark the line for that item with N/A. If you have more than 10 signs you will have to use multiple Serial Number Log pages. The Serial Number Log will also serve as a packing slip for each box. All serial number logs should be submitted to TritiumDisposal along with this return agreement.

Marking inventory fields with N/A when the correct info is clearly available: \$50 Fee, per sign

Returning more signs than listed on your serial number logs: \$100 Fee, per extra sign

JW

Initial

12/09/20

Date



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Packaging Instructions

(Continued)

• STEP 3: Package Your Signs

Pack the signs in a clean, like-new cardboard box. The US NRC requires that the box be sturdy enough to withstand normal shipping procedures. There are to be no more than 10 signs in each box. If your total number of signs is more than 10, do not divide them evenly between multiple boxes. Each box except for the final box is to contain exactly 10 signs. Do not use metal or plastic drums.

Placing more than 10 signs in a single box: \$100 Fee, per extra sign

Dividing signs between boxes resulting in multiple boxes with less than 10 signs: \$100 Fee, per box

Using inappropriately large boxes or any type of drum: Shipment refused and returned to sender

Do not wrap or seal signs individually in bubble wrap or any other material or place them in individual boxes within the master carton.

Failure to comply: \$50 Fee, per sign

To avoid shifting during shipping, fill in any extra space within the box with the appropriate packing materials. Appropriate materials include paper (crumpled, not shredded), block foam, or bubble wrap. Foam peanuts are not preferred. Materials such as cat litter, vermiculite, or sand are not to be used.

Each box is to contain a copy of its matching serial number log. Each serial number log will act as an Inventory list that is specific to that box and only that box.

Failure to include a matching serial number log in each box: \$100 Fee, per box

• STEP 4: Prepare Your Box for Shipping

The RGA number is to be written on the outside of each box in an easily identifiable manner. Placing the RGA number on the shipping label is not considered to be within policy. Failing to follow this procedure may result in your shipment being refused and returned to sender. The RGA number should be written on the top AND one side of each box in large enough lettering to be easily identifiable from several feet away.

Failure to comply: \$100 Fee, per box or refusal of shipment

"UN2911" must be written in an easily identifiable manner on the outside of each box. UN2911 is NOT your RGA number. You will receive your RGA number after you have submitted this disposal agreement to TritiumDisposal.

Failure to comply: \$100 Fee, per box or refusal of shipment

If your shipment contains multiple boxes they must be marked as "1 of x", "2 of x", etc. Markings on the shipping label are not considered as being compliant with this policy. Failing to follow may result in your shipment being refused and returned to sender.

Failure to comply: \$100 Fee, per box or refusal of shipment

*****Do not ship any signs to our corporate office in Columbus, OH.*****

Our goal is for all packages to arrive correctly and no fees to be incurred. Please call or email if you have any questions or need any clarification.

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Fee Schedule

For the Return of Self-Luminous Exit Signs

Below is the full list of fees that may be applied to shipments failing to meet the requirements listed above.

Issue	Additional Fee
Placing more than 10 signs in a single box without TritiumDisposal approval.	\$100.00 per extra sign
Dividing signs between boxes resulting in multiple boxes containing less than 10 signs. There should be only one box in a shipment containing less than 10 signs.	\$100.00 per box
Failing to include a box specific inventory list.	\$100.00 per box
Returning more signs than listed on the RGA Request.	\$50.00 per sign plus standard disposal fee
Failure to remove screws, hardware or mounting brackets or failing to convert double faced signs to singles when appropriate.	\$50.00 per sign
Marking any information on the serial number log as N/A and the signs arrive with that information readily available.	\$50.00 per sign
Returning damaged signs without properly notifying TritiumDisposal.	\$300.00 per sign plus upgrade to normal damaged sign price.
Failing to properly number each box in your shipment as described in step 4 of this disposal agreement.	\$100.00 per box or refusal of shipment.
Failing to display the RGA number as described in step 4 of this disposal agreement.	\$100.00 per box or refusal of shipment.
Individually wrapping signs in bubble wrap or other material or placing in individual boxes within the master carton.	\$50.00 per sign.

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This Serial Number Log must also accompany each box as a packing slip and so must accurately reflect the inventory of EACH box.

Inventory Box Number: 1 of 2

Line	Manufacturer Name	Model Number	Serial Number	Date of Manufacture	Activity (Ci or TBq amount)
1	SRB Technologies	8100	662802	11/2000	20
2	Safety Light Corporation	880	C11726	1/2001	115
3	Safety Light Corporation	880	C11822	1/2001	115
4	Safety Light Corporation	880	C11758	1/2001	115
5	Safety Light Corporation	880	C11767	1/2001	115
6	Safety Light Corporation	880	C11810	1/2001	115
7	Safety Light Corporation	880	C11808	1/2001	115
8	Safety Light Corporation	880	C11814	1/2001	115
9	Safety Light Corporation	880	C11777	1/2001	115
10					

JW

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Please email this log to sales@tritiumdisposal.com or fax to: 614-863-0622.
Make sure to include your contact info if you have not already been assigned a TritiumDisposal account rep.



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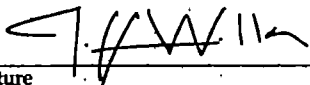
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Individually wrapping signs in bubble wrap or other material or placing in individual boxes within the master carton.	\$50.00 per sign.

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Initial

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This Serial Number Log must also accompany each box as a packing slip and so must accurately reflect the Inventory of EACH box.

Inventory Box Number: 2 of 2

Line	Manufacturer Name	Model Number	Serial Number	Date of Manufacture	Activity (Ci or TBq amount)
1	Safety Light Corporation	2040	A11696	1/2001	23
2	Safety Light Corporation	2040	A11696	1/2001	23
3	Safety Light Corporation	2040	A11704	1/2001	23
4	Safety Light Corporation	2040	A11704	1/2001	23
5	Safety Light Corporation	2040	A11700	1/2001	23
6	Safety Light Corporation	2040	A11700	1/2001	23
7	Safety Light Corporation	2040	A11697	1/2001	23
8	Safety Light Corporation	2040	A11697	1/2001	23
9	Safety Light Corporation	2040	A11698	1/2001	23
10	Safety Light Corporation	2040	A11698	1/2001	23

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