



Rolls-Royce

Rolls-Royce Corporation
P.O. Box 420
Indianapolis, Indiana
46206-0420 USA

March 5th, 2024

Director, Office of Nuclear Safeguards
Attn: Document Control Desk/GLTS
US Nuclear Regulatory Commission
Washington, DC 20555-0001

In fulfillment of the requirements of 10 CFR 31.5 (c) (8), we hereby notify you that on February 13th, 2024 **UPS Tracking #1Z V29 9A6 90 4105 2354** we transferred the self-luminous exit signs listed on the attached spreadsheet to Curie Environmental Services, 4020 Vassar Drive NE, Suite D, Albuquerque NM 87107, State of New Mexico Specific License RS500-03.

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 Laura Groom at (317) 508-8450.

Sincerely,

A handwritten signature in cursive script that reads "Laura Groom".

Laura Groom
HSE Manager
Rolls-Royce Corp.

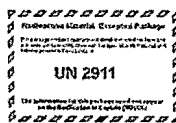
CURIE



ENVIRONMENTAL SERVICES

DOT HAZMAT TRAINING (FUNCTION SPECIFIC) FOR THE RETURN OF TRITIUM (H-3) Exit Signs

- ☛ Self-Luminous exit signs are illuminated with internal light sources powered by tritium (H-3) gas. Tritium gas is a radioactive isotope of hydrogen. For this reason, Federal Regulations require that any person shipping this product must have training sufficient to comply with US Department of Transportation (DOT) regulations in 49 CFR 172. Curie exit sign return kits are designed to be shipped ground as DOT Class 7 UN2911 by UPS small package service. These return kits may also be shipped combination ground/air by UPS small package air service. The kits have been reviewed and modified for air shipment and are in compliance with all DOT air regulations and International Air Transportation Association (IATA) regulations.
- ☛ To receive this training, the shipper must read, understand and perform the following steps. Sign and date this form. Keep this completed form in your files for at least 3 years to be used in case of regulatory inspection. Training must be recompleted every three years for ground shipment and two years for air shipment (IATA 1.5.0.3)
- ☛ Upon receipt of a completed exit sign inventory form, Curie will provide a RMA Number required for the return of these signs. Curie exit sign return kits include all packaging, instructions, pre-paid shipping labels, DOT markings, and DOT function specific training (this document).
- ☛ The exit signs shipped to Curie are shipped as excepted packages for radioactive instruments and articles (49 CFR 173.424 and IATA 10.8.8.3). The maximum activity is 22 Ci per sign and 220 Ci per package in order to be shipped as UN2911 per 49 CFR 173.425 Table 4. The activity limits are based on the decayed activities and may not be exceeded. The only DOT marking required is UN2911 on the external package and is provided in the Curie exit sign return kit. For air shipments, the IATA handling air label (10.7.8.1) shown below is provided and must be used:



- ☛ The sturdy cardboard box in the Curie exit sign return kit qualifies as a strong tight container and meets the general package design requirements of 49 CFR 173.410 (IATA 10.6.2). The package must withstand normal conditions of transport without any deterioration. The container must be clean and never have been near other radioactive material so that the shipper can be sure that there is no radioactive contamination on the outside of the package and it meets the contamination levels prescribed in 49 CFR 173.421 (IATA 10.5.3.2). Curie exit sign return kits meet all of these DOT and IATA shipping requirements.
- ☛ A shipping paper is not required for an excepted package ground shipment per 49 CFR 173.421(a). To qualify for this exception the package must not be a H-3 RQ/hazardous substance (e.g. total package activity must be <100 Ci decayed activity). The Curie return kit is restricted to <100 Ci decayed activity so a shipping paper is not required. For air shipments, air waybills and a dangerous goods declaration is not required (IATA 10.8.8.3.1) but additional information required by IATA 10.8.8.3.3 is supplied on the UPS air shipping label. The approved inventory and UPS tracking will serve as the shipment record.
- ☛ You must ensure that the active materials (the glowing inner tubes) are completely enclosed by non-active components (the plastic sign housing). Therefore, each sign must be visually inspected to ensure that it is not crushed or punctured in a way that might cause an inner light tube to be broken. Refer to the Curie procedure for determining if an exit sign is compromised or damaged.
- ☛ If a transportation incident occurs, you must report the incident to the US DOT per 49 CFR 171.15 and 171.16.
- ☛ Please acknowledge this function specific DOT and IATA Hazmat Training. Retain in your training records and recertification must occur every three years for ground shipments or two years for air shipments (IATA 1.5.0.3). Also read and understand the Curie "Packaging Instructions" and follow each step exactly.

LAURA M. GROOM Laura M. Groom Rolls-Royce 2-12-2024
 Name Signature Company Date

Product Numbers EX-REC & EX-SHP Revised 12.12.2019

4020 VASSAR DRIVE NE, SUITE D ALBUQUERQUE, NM 87107
 © 505.888.9992 F 888.671.4458 W CURIESERVICES.COM



General Licensed Exit Signs

TRITIUM (H-3) EXIT SIGN INVENTORY

Generator: Rolls Royce Customer: UPS
 Curie RMA#: Unique ID #:
 Receipt Date: 2/14/2024 UPS/FedEx # #1ZV299A69041052354
 Curie Cont. # 1.00 Box Number: 1 of 1

Item #	Manufacturer Name	Mfg. Date	Model #	Serial #	Reference Activity (Ci)	Decayed Activity (Ci) as of March 5, 2024	Comments
1	safety light corpation	10/1/04	2040	290954	9.500	3.19	
2						0.00	
3						0.00	
4						0.00	
5						0.00	
6						0.00	
7						0.00	
8						0.00	
9						0.00	
10						0.00	
11						0.00	
12						0.00	
13						0.00	
14						0.00	
15						0.00	
16						0.00	
17						0.00	
18						0.00	
19						0.00	
20						0.00	
21						0.00	
22						0.00	
23						0.00	
24						0.00	
25						0.00	
26						0.00	
27						0.00	
28						0.00	
29						0.00	
30						0.00	
31						0.00	
Total Package Activity (must be <100 Ci per Curie return kit. Refer to instructions.)						3.19	

NOTES:

For standard architectural exit signs, a maximum of 10 sign faces per box are allowed. Only aircraft articles may be >10 per box.

The customer/generator certifies there are no damaged or compromised exit signs in this container and all Curie packaging procedures have been followed. Additional surcharges will be assessed if undeclared damaged or compromised exit signs are present in the container upon receipt by Curie.