



EASTERN TECHNOLOGIES, INC.

Post Office Box 409
Ashford, Alabama 36312

IW016
11005602

February 3, 2006

Deputy Director
Mail Stop O4 E21
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Application Fee Payment for License for Import of Radioactive Material

Dear Deputy Director:

I originally submitted an application for a license for import of radioactive material in a letter to you dated November 7, 2005. Accompanying that application was a check in the amount of \$1600.00 for the license application fee, which we believed was the applicable fee for our license application at that time. Based on discussions with Mr. Steve Dembek and Ms. Janice Owens of your staff, we understand that the correct fee for our application is \$7500.00, as required by 10CFR Part 110, Paragraph 110.31(b) and the fee schedule in 10CFR Part 170, Paragraph 170.31, Category 15.B.

Therefore, we are enclosing another check in the amount of \$5900.00 which, along with our original check, will bring the payment of our application fee to the required amount of \$7500.00.

Based on the payment of the required fee, we respectfully request that you proceed with the processing of our application for import or radioactive material.

If you have any questions regarding our application or require additional information, please contact Mr. Douglas Kay, our company technical contact for this project, at 817-559-0506. You may also contact me at 334-899-4351 or at the address listed below.

Sincerely,

Mark Fellows
Vice-President
Eastern Technologies, Inc.
P.O. Box 409
Ashford, AL 36312

Attachments
Enclosure

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EASTERN TECHNOLOGIES, INC.

Post Office Box 409
Ashford, Alabama 36312

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November 7, 2005

Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Application for License for Import of Radioactive Material

Dear Deputy Director:

Pursuant to 10 CFR Part 110, Paragraph 110.31, I am writing to submit an Application for a License to Import Radioactive Material. My company, Eastern Technologies, Inc. (ETI), desires to enter into an agreement with Comisión Federal de Electricidad to provide radiological protective clothing and related products and associated protective clothing decontamination services for the Laguna Verde nuclear power plant in Veracruz, Mexico. We would perform these services at our facility in Ashford, Alabama which is licensed by the State of Alabama to perform such services. We currently provide similar products and services to approximately 50 percent of the U.S. commercial nuclear power plant sites at our Ashford, Alabama facility.

Performance of these services will require that we import the used protective clothing and related supplies from the Laguna Verde plant in Mexico to our facility in Alabama. We anticipate responding to a Request for Proposal in the near future for protective clothing related services and possessing such a license for importation of radioactive material will be necessary to demonstrate ETI's ability to delivery the services requested.

To facilitate your review of our license application, the information required pursuant to 10 CFR Part 110, Paragraph 110.32, "Information required in license application for specific license," is included in Attachment 1 to this letter. Our current radioactive material license issued by the State of Alabama, is included in Attachment 2 to this letter. This license authorizes ETI to collect, launder and decontaminate launderable items, collect and treat polyvinyl alcohol based (e.g., dissolvable) items, and to manage associated decontamination waste.

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I have also enclosed a check in the amount of \$1600.00 for payment of the license application fee as required by 10CFR Part 110, Paragraph 110.31(b) and the fee schedule in 10CFR Part 170, Paragraph 170.31, Category 15.D.

If you have any questions regarding this application or require additional information, please contact Mr. Douglas Kay, our company technical contact for this project, at 817-559-0506. You may also contact me at 334-899-4351 or at the address listed below.

Sincerely,



Mark Fellows
Vice-President
Eastern Technologies, Inc.
P.O. Box 409
Ashford, AL 36312

Attachments
Enclosure

ATTACHMENT 1

§110.32 Information required in an application for a specific license/NRC Form 7.

- (a) Name and address of applicant.

Eastern Technologies, Inc.
Attn: Mark Fellows, Vice-President
P. O. Box 409 (Mailing Address)
215 2nd Ave. (Physical Address)
Ashford, Alabama 36312

- (b) Name and address of supplier of equipment or material.

Comisión Federal de Electricidad
Central Laguna Verde
Km. 42.5 Carretera Cardel-Nautla
Veracruz, VER
Atn: Ing. Sergio Zorrilla Romero

- (c) Country of origin of equipment or material, and any other countries that have processed the material prior to its import into the U.S.¹

Country of Origin - Mexico

- (d) Names and addresses of all intermediate and ultimate consignees, other than intermediate consignees performing shipping services only.

All material will be shipped directly to:
Eastern Technologies, Inc.
215 2nd Ave.
Ashford, AL 36312

- (e) Dates of proposed first and last shipments.

It is anticipated that the first shipment of material for import will occur in mid to late first quarter 2006. It is also anticipated that an agreement between Laguna Verde and ETI for radiological laundry decontamination services and/or dissolving and decontamination of

(Note: This is meant to include all obligations attached to the material, according to the definition of obligations in §110.2. Licensees must keep records of obligations attached to material which they own or is in their possession.)

Polyvinyl alcohol (PVA) based products would be for a 3 year duration ending in December 2008. Shipments of material to ETI for processing will occur periodically throughout this time frame. Shipments will be scheduled to support the operational needs of the Laguna Verde nuclear generating station.

(f) Description of the equipment or material including, as appropriate, the following:

(1) Maximum quantity of material in grams or kilograms (curies for byproduct material) and its chemical and physical form.

Used protective clothing and related items will be transported in 40' sealand containers. Typically such a container of material will have a total activity ranging from less than one (1) millicurie to one-hundred (100) millicuries of corrosion activation products and mixed fission products. The total activity present in any given shipment is dependent on the levels of contamination present on the clothing. The activation products, such as Co-60, Co-58, and Mn-54, typically comprise the predominate radionuclides. The used protective clothing products are in a solid form and are typically fabricated from cotton, poly-cotton, nylon, rubber or polyvinyl alcohol. The radioactive contaminants are typically in the form of small, solid particulate metal oxides.

The total amount of radioactivity that can be received at the ETI facility per the facility license issued by the State of Alabama is 2.5 Curies for isotopes with atomic number 1 to 83, and 20 millicuries for isotopes with atomic number 84 to 101 (except source or special nuclear material). The facility limits on total activity applies to material received from all sources. ETI currently receives similar material from about 50% of the commercial nuclear power plant sites in the U.S. and manages the material to stay well below the limits on total activity. The material to be imported from Mexico will not add appreciably to the total amount of radioactive material currently managed at the ETI facility at any given time.

(2) For enriched uranium, the maximum weight percentage of enrichment and maximum weight of contained U-235.

N/A

- (3) For nuclear equipment, total dollar value.

N/A

- (4) For nuclear reactors, the name of the facility and its design power level.

N/A

- (5) For proposed exports or imports of radioactive waste, and for proposed exports of incidental radioactive material -- the volume, classification (as defined in §61.55 of this chapter), physical and chemical characteristics, route of transit of shipment, and ultimate disposition (including forms of management) of the waste.

A typical shipment of used protective clothing and related products shipped in a 40' sealand will comprise up to 2080 ft³ of material with a mass ranging from about 5,000 lbs to 12,000 lbs depending on the amount loaded and the efficiency of packing the sealand container. If similar material were being transported for land disposal, it would be classified as Class A as defined in 10CFR Part 61, Paragraph 61.55. The physical and chemical characteristics of the material are the same as described in (f)(1), above.

Shipments may be via highway or water with the exact routing to be established prior to each shipment.

The used protective clothing and related items will be received at the ETI facility located in Ashford, Alabama under the radioactive materials license issued to ETI by the State of Alabama. This License authorizes ETI to collect, launder and decontaminate launderable items and to collect and treat polyvinyl alcohol (PVA) based items and manage associated decontamination wastes. Residual waste associated from the decontamination processes become ETI's secondary waste and is sent by ETI to a third party, licensed waste processor and are ultimately disposed of at the Envirocare of Utah radioactive waste disposal site. This secondary waste includes decontamination process filters, lint from the laundry process, and residual components from dissolvable products.

- (6) For proposed imports of radioactive waste -- the industrial or other process responsible for generation of the waste, and the status of

the arrangements for disposition, e.g., any agreement by a low-level waste compact or State to accept the material for management purposes or disposal.

The proposed imports originate at a nuclear power generation facility and are generated as a result of plant operation, maintenance and refueling activities. The imports are comprised of used protective clothing and related decontamination supplies.

As stated above, ETI will decontaminate the material and the residual materials resulting from the decontamination processes are considered secondary waste and are shipped by ETI for final processing and disposal. This secondary waste is ultimately disposed of at the Envirocare of Utah radioactive waste disposal site.

It should be noted that ETI's existing U.S. customers do not manifest and track similar material shipped to ETI as radioactive waste since our processes are licensed as "decontamination processes." Appendix G to 10 CFR Part 20 states that "Decontamination Facility" means a facility licensed under a Commission or Agreement State license whose primary purpose is decontamination of equipment or materials to accomplish recycle, reuse, or other waste management objectives, and for purposes of this part is not considered to be a consignee for LLW shipments. The proposed material to be imported from Mexico will be received and dispositioned in the same fashion as material from our current customers.

- (7) Description of end use by all consignees in sufficient detail to permit accurate evaluation of the justification for the proposed export or import, including the need for shipment by the dates specified.

ETI will be the consignee for this material and will receive the material for decontamination. Launderable materials will be decontaminated using a conventional radiological laundering process. Laundered material will be returned to the Laguna Verde Nuclear Power Plant for reuse at the plant. PVA products will be treated to dissolve the PVA material. The dissolved PVA is subsequently decontaminated and

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released to the environment in accordance with regulatory limits incorporated in the ETI license.

Shipments will occur periodically over the duration of the commercial agreement between Laguna Verde and ETI and will be scheduled to support the operation needs of the Laguna Verde station. It is anticipated that 25 to 35 shipments per year may be required.