



# Pacific EcoSolutions

2025 Battelle Boulevard ~ Richland, WA 99354 ~ 509.375.5160 ~ 509.375.0613

July 14, 2006

Deputy Director  
Office of International Programs  
Mail Stop 04E21  
U.S Nuclear Regulatory Commission  
Washington D.C. 20555-0001

Dear Sir or Madam:

This letter is intended to make notification concerning the Import License IW006 issued to Allied Technology Group, Inc (ATG) September 8, 1998 for material received from Taiwan Power Company (Tai-Power) (attachment 1).

Pacific EcoSolutions (PEcoS) purchased the ATG assets in September 2003. There was approximately 600,000 pounds of unprocessed material from Tai-Power as well as secondary waste (sand blast grit from decontamination of previously processed tubes) that had not been disposed of. A letter was sent to the State of Washington Department of Health (WDOH) on June 6, 2006 (attachment 2). This letter explained the concern we had with the conflict between the Northwest Compact agreement and the Import license description of the secondary waste final disposition.

In a June 26, 2006 letter from WDOH (attachment 3), concurrence was given that the waste should be sent to an out of compact facility.

PEcoS intends to dispose of the secondary waste that can be identified as out of compact at the Energy Solutions Clive, Utah facility (formerly Envirocare of Utah). Please contact Dave Dalton by July 31, 2006 if you are not in agreement with this decision. Dave can be reached at 509/375-7026 or you can e-mail him at [david.dalton@pacificecosolutions.com](mailto:david.dalton@pacificecosolutions.com)

Sincerely,

Curt Cannon  
Radiation Safety Officer

cc: WDOH correspondence file. Sean Murphy (WDOH), Scott Call (PEcoS), Marla Garcia (PEcoS), Mike McCargar (PEcoS), Dave Dalton (PEcoS), Chris Britton (PEcoS), Mike Elsen (WDOH), Mike Garner (WDOE), and Sandy Muller (PEcoS)

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## United States Nuclear Regulatory Commission

Washington, DC 20555

### Import License

Pursuant to the Atomic Energy Act of 1954, as amended, and Title 10, Code of Federal Regulations, Chapter 1, Part 110, a license is hereby issued to the licensee designated below authorizing the import of nuclear materials and/or facilities into the United States of America in accordance with the statements and representations made by the licensee in the application referenced below. This license is subject to all applicable rules, regulations, and orders of the United States Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

NRC License Number: 1W006

Expiration Date: 31 December 2000

Application Date/Reference Number: Application dated 11/18/97

Licensee: Allied Technology Group, Inc. (ATG)  
2025 Battelle Boulevard, P.O. Box 969  
Richland, Washington 99353  
Attn: W. M. Hewitt

Quantity and Type of Material: Radioactive scrap tubing and tube plate. Approximately 750,000 kilograms (110 cubic meters if closely packed) of aluminum-bronze and nickel-copper condenser tubing contaminated on the surface with 1.3 Gbq. (36 mCi) of Cobalt-60 and Cesium-137 oxides. The waste includes approximately 124,000 pieces, 6.86 meters long, and 68,000 pieces, 3.42 meters long, of tubing, all 2.5 cm outside diameter.

Point of Origin: Taiwan (Taiwan Power Company)

End Use: For decontamination and recovery of the metal for recycling. The secondary waste resulting from the decontamination process will be disposed of at US Ecology's low-level waste disposal facility in Richland, Washington.

Receiving Facility in the United States: Allied Technology Group, Inc.  
2025 Battelle Boulevard  
Richland, Washington 99353

Radioactive Material License Number WN-10393-1, issued by the State of Washington, Department of Health.

For the U.S. Nuclear Regulatory Commission

Name: Ronald D. Hauber

Signature: Ronald D. Hauber

Title: Director, Non-Proliferation, Exports & Multilateral Relations, Office of International Programs

Date of Issuance: September 8, 1998

License Condition: Only the successful bidder for the Taiwan Power Company contract will be authorized to import the radioactive scrap into the United States.



Pacific EcoSolutions

2025 Batielle Boulevard ~ Richland, WA 99354 ~ 509.375.5160 ~ 509.375.0513

June 6, 2006

Gary Robertson  
Department of Health  
111 Israel Road SE, 4<sup>th</sup> Floor  
Tumwater, WA 98501

P.O. Box 47827  
Olympia, WA 98504-7827

Dear Mr. Robertson:

This letter is a follow-up to conversations surrounding the Ti-Power secondary waste generated by Allied Technology Group (ATG) during sandblasting operations performed at the Richland facility currently owned by PEcoS.

In a letter to Kevin Salmon dated June 30, 1998 from Jeff Breckel on behalf of the North West Interstate Compact ATG was authorized to dispose of commingled, indistinguishable low-level waste resulting from the decontamination of the condenser tubes from Ti-Power at the US Ecology, Richland disposal facility.

PEcoS has been working through backlog waste left at the facility by ATG in an effort to clean up the liability to PEcoS and the State of Washington. While there is clearly some secondary waste that has been commingled and is indistinguishable; PEcoS has identified 60,247 net pounds of waste (sand blast grit) that was removed from the blasters by ATG for cleaning these tubes. There is no record of these blasters ever being used to clean other generators waste nor do the employees retained by PEcoS that were involved in the sand blast operation recall the equipment being used for any other contaminated material.

PEcoS is requesting help in resolving the NRC import license 1W006 that states "The secondary waste resulting from the decontamination process will be disposed of at US Ecology's low-level waste disposal facility in Richland, Washington."

If you have any questions or comments please call me at 509/375-7052 or e-mail me at [curt.cannon@pacificecosolutions.com](mailto:curt.cannon@pacificecosolutions.com)

Sincerely,

Curt Cannon  
Manager EHS&Q

cc: WDOH correspondence file, Earl Fordham (WDOH), Sean Murphy (WDOH Richland office), Mike Elson (WDOE), Dave Dalton (PEcoS), Mike McCargar (PEcoS), Scott Call (PEcoS), Sandra Muller (PEcoS), Mike Garner (WDOE), and Chris Britton (PEcoS).



received  
11/11/06 - 7/13/06

STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

111 Israel Road SE • PO Box 47827 • Olympia, Washington 98504-7827

TDD Relay Service: 1-800-833-6388

June 26, 2006

Curt Cannon, RSO  
Pacific EcoSolutions  
2025 Battelle Blvd  
Richland, Washington 99354

Dear Mr. Cannon:

This is in response to your letter dated June 6, 2006, regarding secondary waste (sandblast grit) resulting from the attempted decontamination of Taiwan Power condenser tubes, by Allied Technology Group (ATG) during sandblasting operations performed at the Richland facility, prior to Pacific EcoSolutions (PECoS) buying the facility.

According to your letter, PECoS has identified 60,247 net pounds of waste (sandblast grit) that were removed from the blasters by ATG for cleaning these tubes. There is no record of these blasters ever being used to clean other generators' waste, nor do the employees retained by PECoS that were involved in the sandblast operation or the state's resident inspector recall the equipment being used for any other contaminated material. Furthermore, you have requested help in resolving the U.S. Nuclear Regulatory Commission (USNRC) import license #1W006 that states "The secondary waste resulting from the decontamination process will be disposed of at US Ecology's low-level waste disposal facility in Richland, Washington."

The Department of Health has reviewed your letter and concurs that the sandblast grit from the Pangborn sandblaster was used exclusively for the decontamination of the Taiwan Power condenser tubes. Therefore, this sandblasting grit would be attributed to Taiwan Power Corporation as detailed in the June 30, 1998 letter from Jeff Breckel, Northwest Compact Chair, to Kevin Salmon of ATG. In this case, since the waste originated from outside the Northwest Compact, it would not be eligible for disposal at the US Ecology LLRW disposal facility located near Richland, Washington. Prior to sending this waste to another disposal facility, you should notify the USNRC in writing that you cannot dispose of the secondary waste at the US Ecology facility, for the above reasons, and that you have found an alternate disposal facility. This needs to be done so that they can properly close out your Import license #1W006. The notification to the USNRC should be sent to:

Curt Cannon, RSO  
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Deputy Director  
Office of International Programs  
Mail Stop O4E21  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555-0001

It is requested that you copy the department on the correspondence regarding this matter.

Your letter also discusses other secondary waste from this decontamination project that has been commingled and is indistinguishable from other waste and cannot be attributed to any particular generator. This waste is properly attributed to ATG as in-region waste. For that waste, authorization for disposal at the US Ecology facility near Richland was given in a letter dated June 30, 1998, from Jeff Breckel of the Northwest Compact to Kevin Salmon of ATG.

If you should have any questions, do not hesitate to contact this office.

Sincerely,



Mikel J. Elsen, Supervisor  
Waste Management Section

cc: Mike Garner, Ecology  
Sean Murphy, DOH  
Earl Fordham, DOH