

October 13, 2006

Mr. Robin DeLaBarre
U.S. Department of State
2201 C Street, NW
Office of Nuclear Energy Affairs, Room 3318
Bureau of International Security and Nonproliferation
Washington, D.C. 20520

Dear Mr. DeLaBarre:

Enclosed are two applications for licenses (IW019 and XW011) recently received by the U.S. Nuclear Regulatory Commission (NRC) from UniTech Services Group, Inc. (UniTech), for proposed imports from and exports to Canada of various solid materials, which may be contaminated. If declared waste after being returned to Canada, such materials would be classified as Class A Radioactive Waste by U.S. standards.

UniTech is requesting the import license (IW019) to receive various metals and dry activity materials (paper, cardboard, plastic, cloth, rubber, wood, etc.) from various Canadian nuclear power plants, which may be contaminated to varying degrees with source, special nuclear or byproduct materials. UniTech has offered to characterize the materials for its Canadian customers, and sort them by type and by levels of radioactivity (non-radioactive/ indistinguishable from background, removable versus nonremovable contamination, fixed contamination/dose rate, concentrations of radionuclides, etc.) as warranted. Contaminated solids received by Unitech will not exceed 30,000 pounds at any given time, and the total quantity of radioactive contaminants on such materials will not exceed 0.005 TBq at any given time. The maximum total quantity or annual throughput of radioactive contaminants on materials imported will not exceed 0.5 TBq/year over the duration of the import license.

After characterizing and sorting the imported materials, UniTech is requesting the export license (XW011) to return them to its Canadian customers for appropriate disposition. None of the materials imported under IW019 will remain or be disposed of in the United States, and UniTech's Canadian customers will decide which of the sorted materials should be reused, recycled and/or disposed of as either radioactive or non-radioactive waste in accordance with Canadian Government requirements. The maximum total quantity or annual throughput of radioactive contaminants on materials being returned will not exceed 0.5 TBq/year over the duration of the export license.

Before taking action on these two applications, we would appreciate your assistance in notifying the Canadian Government of the proposed imports and exports and obtaining any comments they might have in the context of the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management. We would also appreciate receiving your views as to whether the proposed imports and exports would be consistent with the Convention's guidelines. Upon receipt of your response, NRC will consult with officials in the

R. DeLaBarre

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State of Massachusetts, where UniTech is located and licensed to provide the services described. Since all materials are to be returned, the NRC requirement to provide information on the status of arrangements for disposition (e.g., any agreement by a low-level waste compact or State to accept the material for management or disposal) does not apply.

Sincerely,

/RA/

Stephen Dembek, Section Chief
Export Controls and International Organizations
Office of International Programs

Enclosures:

1. Appl. Dtd. 08/17/06 - Canada
Import License IW019
Docket No. 11005650
2. Appl. Dtd. 08/17/06 - Canada
Export License XW011
Docket No. 11005649

cc w/enclosure:

B. Moran, NRC/NSIR
S. Oehlbert, DOE/NNSA
I. Bruns, DOE/NNSA
S. Clagett, DOC
R. Goorevich, DOE
J. Fedrigo, DOD
M. Taylor, DHS/CBP
M. Romano, NAC/NMMSS
CNSC

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* See previous concurrence

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