

November 1, 2006

MEMORANDUM TO: Larry W. Camper, Director
Division of Waste Management
Office of Nuclear Material Safety and Safeguards

FROM: Margaret M. Doane, Deputy Director /RA/
Office of International Programs

SUBJECT: PROPOSED IMPORT AND EXPORT OF RADIOACTIVE WASTE
FROM CANADA (APPLICATION NOS. IW019 AND XW011)

The Office of International Programs (OIP) requests your assistance to perform a technical review of the enclosed application documents from UniTech Services Group, Inc. (UniTech) for licenses to import and export Class A radioactive waste from and to Canada. Specifically, we need your assessment of whether the descriptions of the proposed import and export are sufficient to make a determination that issuing the import license would not constitute an unreasonable risk to the public's health and safety.

UniTech is requesting the import license (IW019) to receive various metals and dry activity materials (paper, cardboard, plastic, cloth, rubber, wood, etc.) from Canadian nuclear power plants, which may be contaminated 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.

Notice that OIP received these applications was published in the Federal Register dated October 24, 2006 (71 FR 62301-62302). In addition, OIP requested assistance from the U.S. Department of State (DOS) to notify the Government of Canada regarding the UniTech import and export license requests and to obtain any comments that the Canadian Government might

have in the context of the Joint Convention on the Safety of Spent Fuel Management and on Radioactive Waste Management. OIP also requested DOS views as to whether the subject import will be consistent with the Convention's guidelines. OIP will also provide this same information to officials in the State of Massachusetts (where UniTech is located and licensed to provide the services described). Since all materials will be returned to Canada, we do not believe it is necessary to contact the interested Low-Level Radioactive Waste Compact Commission.

I would greatly appreciate receiving a response within two weeks from the date of this memorandum as to whether issuance of the proposed import and export licenses is recommended and would not constitute an unreasonable risk to public health and safety. If you cannot complete a review and provide such a recommendation within that time frame, or determine that additional information is needed from the applicant, please contact me at (301) 415-2724 or Ms. Janice Owens at (301) 415-3684 at your earliest convenience.

Enclosures:

1. IW019 Appl. Dtd. 08/17/06
Docket Number 11005650
2. XW011 Appl. Dtd. 08/17/06
Docket Number 11005649

cc w/encls:

S. Smith, FSME
R. Whited, FSME
J. Shaffner, FSME
B. Moran, NMSS

J. Kennedy, FSME
D. Cool, FSME
G. Kim, OGC
O. Bukharin, NSIR

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DOCUMENT NAME: S:\Imports\Imports - DWM\IW019 & XW011 Memo to DWM.wpd
DOCUMENT NAME: S:\Exports\Exports - DWM\XW011 & IW019 Memo to DWM.wpd

ADAMS ACCESSION NOS.:

TEMPLATE NO.: OIP-004

Package No.: ML063040285
Memo No.: ML063060066
Enclosure 1 No.: ML062720331
Enclosure 2 No.: ML062720334

* See previous concurrence

Publicly Available Non-Publicly Available Sensitive Non-Sensitive

OFFICE	OIP	OIP	SC:OIP	OGC	DD:OIP
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DATE	10/31/06	10/31/06	10/31/06	11/1/06	11/2/06