

NRC FORM 7 (6-2006) 10 CFR 110	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0027 EXPIRES: 06/30/2009	Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.
APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT, OR RENEWAL (See Instructions on Page 5)			

PART A. FOR NRC USE ONLY	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC	DATE RECEIVED 5-21-07
LICENSE NUMBER F0022	ROCKET NUMBER 11005700	ADAMS ACCESSION NUMBER

PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS
 (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

1. NAME AND ADDRESS OF APPLICANT/LICENSEE Pacific EcoSolutions, Inc. 2025 Battelle Boulevard Richland, Washington 99354	1a. NAME OF APPLICANT'S CONTACT Curt Cannon	1b. APPLICANT'S REFERENCE NUMBER Appl. Dtd. 5-16-07
	1c. PHONE NUMBER (509) 375-7052	1d. FAX NUMBER (509) 375-0613
1e. E-MAIL ADDRESS curt.cannon@PacificEcoSolutions.com aft sale: ccannon@perma-fix.com		

2. TYPE OF NRC LICENSE REQUESTED (Check One)

EXPORT (Parts B, C, E)
 IMPORT (Parts B, D, E)
 COMBINED EXPORT/IMPORT (Parts B, C, D, E)
 AMENDMENT/RENEWAL Existing License Number.

3. CONTRACT NUMBER(S)	4. FIRST SHIPMENT DATE 08/01/2007	5. LAST SHIPMENT DATE 08/01/2012	6. PROPOSED EXPIRATION DATE 08/30/2012
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PART C. TO BE COMPLETED FOR EXPORT ONLY OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS
 (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT Perma-Fix Northwest, Inc 2025 Battelle Boulevard Richland, Washington 99354	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) n/a	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S) <div style="background-color: black; width: 100px; height: 40px; margin-bottom: 10px;"></div> <div style="font-size: 2em; font-family: cursive; text-align: center;"> Rec'd 5-21-07 RB </div>
7a. LIST FUNCTIONS PERFORMED/SERVICE PROVIDED See attached addendum	8a. INTERMEDIATE USE(S)	9a. ULTIMATE END USE(S) See attached addendum

10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS Waste from processing contaminated material originating from Canada. See attached addendum	10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) See attached addendum	10b. MAX ENRICHMENT OR WGT % 5%	10c. MAX ISOTOPE WGT (KG) 35 kg over a 5 year period
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11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)
 none


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(6-2006)
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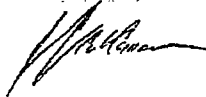
APPLICATION FOR NRC EXPORT/IMPORT
LICENSE, AMENDMENT, OR RENEWAL (Continued)

LICENSE NUMBER 7W022	DOCKET NUMBER 11005700	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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PART D. TO BE COMPLETED FOR IMPORT ONLY, OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT 	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S) n/a	14. NAME(S) / ADDRESS(ES) OF ULTIMATE CONSIGNEE(S) Perma-Fix Northwest, Inc 2025 Battelle Boulevard Richland, Washington 99354	
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S) WN-10393-1 / September 15, 2008	
	13b. INTERMEDIATE USE(S)	14b. INTERMEDIATE USE(S) See attached addendum	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES Contaminated material including metals, wood, paper, concrete, cloth, rubber, plastic, and liquids such as aqueous and organic based fluids. This includes material used in research and medical facilities such as animal carcasses, and human and animal waste.	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) See attached addendum	15b. MAX ENRICHMENT OR WGT % 5%	15c. MAX ISOTOPE WGT (KG) 35kg over 5 years
16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) none			

PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.		
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL Curt Cannon Radiation Safety Officer (RSO)	18b. SIGNATURE - AUTHORIZED OFFICIAL 	18c. DATE 5/16/07

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(6-2006)
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT/IMPORT
LICENSE, AMENDMENT, OR RENEWAL (Continued)

LICENSE NUMBER 7W022	DOCKET NUMBER 11005700	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

See attached addendum



Pacific EcoSolutions

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

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11005700

May 15, 2007

Ms. Margaret Doane
Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Applications for 1) Specific License to Import Radioactive Material
2) Specific License to Export Radioactive Material

Dear Ms. Doane:

Pacific EcoSolutions, Inc. (PEcoS) holds a material license from the State of Washington for processing contaminated material. PEcoS is being acquired by Perma-Fix Environmental Services, Inc. and will be renamed effective June 1, 2007 as Perma-Fix Northwest, Inc. The business plan of PEcoS as Perma-Fix Northwest, Inc will include processing imported material from Canada. Recognizing that an import/export license requires some time for processing and to avoid delays of the expected business operations, PEcoS is now requesting a specific license to import potentially radioactively contaminated material from Canada to Perma-Fix Northwest in Richland, Washington for processing under Perma-Fix Northwest's Washington licenses which will be transferred from PEcoS. A specific license to authorize the export of radioactive waste generated from this processing to the extent necessary back to Canada is also requested. Since Perma-Fix Northwest, Inc. will be effective by the time the license is issued, the application is being written with references to Perma-Fix Northwest, Inc. rather than PEcoS. It is recognized that the NRC import and export licenses will not be effective until PEcoS becomes Perma-Fix Northwest, Inc and the Washington State license is transferred to Perma-Fix Northwest, Inc. PEcoS/Perma-Fix will notify NRC when these events happen.

This license is a generic license to allow the importation of up to 5500 tons of radioactively contaminated material including metals, wood, paper, concrete, cloth, rubber, plastic, and liquids such as aqueous and organic based fluids. This includes material used in research and medical facilities such as animal carcasses, and human and animal waste. The sources of this material are not fully known as of the date of this application but will be limited to Canadian facilities authorized by Canada to use and possess radioactive material such as reactors, fuel cycle facilities, and material licensees or facilities equivalent to US Superfund sites. It is expected that the material to be imported would be generated during various activities such as remediation, decontamination, decommissioning, maintenance, equipment upgrades, and routine operational activities

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The purpose of the import license is to import potentially contaminated material for processing (volume reduction via thermal and non-thermal treatment) and beneficial reuse by 1) recycling metals for reuse as much of the metal as possible and 2) using liquids for temperature control purposes in Perma-Fix Northwest's thermal operations. The purpose of the export license is to allow waste that is attributable to Canadian sources under this import license to be exported back to Canada.

The applications are attached in Attachments 1, 2, and 3. We assume NRC will appropriately delete possession limit information in the interest of materials security prior to making these documents publicly available. We are enclosing a check in the amount of \$16,200 to address the fees for two applications specified in 10 CFR 170.31, Category 15 B., assuming Executive Branch, but not Commission review, is required for each application.

If you have any questions or need additional information, please do not hesitate to call me at 509-375-7052 or at curt.cannon@pacificecosolutions.com or (ccannon@permafix.com after purchase).

Respectfully submitted,



Curt Cannon
Radiation Safety Officer
PEcoS.

cc.

Mikel Elsen, State of Washington

Attachments:

- 1) Import/Export Application (Form 7)
- 2) Addendum to Import Application
- 3) Addendum to Export Application

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ATTACHMENT 2

ADDENDUM TO IMPORT APPLICATION

1) Name and Address of Applicant (10 CFR 110.32(a))

Perma-Fix Northwest, Inc.
2025 Battelle Boulevard
Richland WA 99354

Contact:
Curt Cannon
Ph. 509-375-7052
Email: ccannon@perma-fix.com

2) Name and Address of Supplier of the Material (10 CFR 110.32 (b))

There will be multiple Canadian sources for the suppliers under this proposed US import license. Each will be authorized by Canada to possess and use radioactive material. The Canadian sources are not fully known at this time. The source for our initial work is:

[REDACTED]

Business arrangements for other suppliers have either not been initiated or completed. Perma-Fix Northwest will supply this information in the form of a license amendment once such arrangements have been completed and, at least, 60 days in advance of any import. Consistent with the concept for a minor license amendment, imports under this license for future suppliers will be enveloped by the provisions in this application. Consequently, it is expected that future amendments will only need to address changes to this section of the application.

3) County of Origin (10 CFR 110.32(c))

Canada

4) Ultimate Consignee (10 CFR 110.32 (d))

Perma-Fix Northwest, Inc.
2025 Battelle Boulevard
Richland WA 99354

Contact:
Curt Cannon
Ph. 509-375-7052
Email: ccannon@perma-fix.com

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5) Dates of Proposed First and Last Shipment (10 CFR 110.32(e))

Shipments expected between 2007 and 2012.

Shipments of material will not be imported under this proposed US import license until Canada has issued an import license to allow waste associated with the particular import to be returned back to Canada. It is expected that there will be multiple import licenses issued by Canada during the duration of this proposed US import license. Perma-Fix Northwest does not object to a license condition that limits each import under this license to materials that Canada has issued an import license for the return of the associated radioactive component.

6) Description of the Material (10 CFR 110.32(f)(1 and 5))

The material to be imported consists of up to 5500 tons of radioactively contaminated material including metals, wood, paper, concrete, cloth, rubber, plastic, and liquids such as aqueous and organic based fluids. This includes material used in research and medical facilities such as animal carcasses, and human and animal waste

The material to be imported consists of up to approximately 1000 tons of metal, 4000 tons of dry activity material, and 500 tons of liquids with the following approximate quantities:

<u>Material</u>	<u>Weight Pounds/ Kilograms</u>
Metals	
Ferrous Metal/ Non-Ferrous	2 Million / 0.9 Million
Dry Activity	
Burnable	7 Million / 3.2 Million
Non-burnable	1 Million / 0.45 Million
Liquids (aqueous and organic based)	1 Million / 0.45 Million

The radionuclides in the contamination imported over the duration of the proposed license will not exceed the following limits which are 10 times the possession limits of Perma-Fix Northwest's Washington licenses WN-10393-1 (Perma-Fix Northwest recognizes that it must at all times keep the total amount of material possessed at its site consistent with the possession limits in its Washington license):

<u>Radionuclides</u>	<u>Ci/TBq *</u>
Atomic #1-83 (other than DAM/DAW) except:	3600/133
Co-60	400/14.8
Sr-90	40/1.48
Nb-94	75/2.77
Cd-113m	20/0.74
I-129	5/0.185
Eu-154	20/0.74
Pb-210	1/0.037
Source material	50,000 kgs total (16.7 curies if U-238)
Any other radioactive Numbers Atomic #84-103	

Round up to
134.0 TBq
total

] ≈
0.618
TBq.

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except SNM and Source Material

1/0.037 total, except Ra-226
- 5000 mCi (185,000 MBq)

≈
0.185
TBq.

SNM

3500 grams U235 Equivalent
Not to exceed unity formula
quantities as specified in
WAC 246-220-010 under the
definition "Special nuclear
material in quantities not
sufficient to form a critical
mass."** Enrichment level is
not expected to exceed
5%. (as noted above this is
the amount over a five year
period, at no time will the
350 gram limit be exceeded)

≈
0.0003
TBq.

- The above quantities are further limited by Washington license Condition 24 that provides that with the exception of Cs-137, possession limits cannot exceed the amounts needed for an emergency plan provided in WAC 246-235-150 which is equivalent to 10 CFR 30.72, 40.31(j), & 70.22(i). For purposes of the quantities to be imported over the period of the license, the quantities would not exceed 10 times the amount limited by Condition 24. (In the event that an updated Emergency Plan is put in place this condition may be exceeded if written approval is obtained from the Washington Department of Health.)

** WAC 246-220-010 is equivalent to 10 CFR 150.11

The chemical and physical form of the above isotopes may be in any form suitable for transport under US DOT regulations consistent with the limitations in Perma-Fix Northwest's Washington licensees.

It is expected that the imports will involve numerous shipments during the term of the license. No one shipment will exceed the values found in 10 CFR Part 110, Appendix P, Table I, Category 2. In addition, no one shipment will exceed 10% of the above limits so that a shipment will not exceed the possession limits of Perma-Fix Northwest's current State of Washington Agreement State license. Perma-Fix Northwest recognizes that it must keep the total amount of material possessed at its site consistent with the possession limits in its Washington license.

Shipments may include one or more packages of material. However, the quantities of radioactive material in any one package will not exceed the Table A₂ values of 49 CFR 173.435.

In addition, the imported material will not exceed class A as defined in 10 CFR 61.55. Imported material will not include mixed waste (mixed hazardous and radioactive waste constituents) as defined under the Resource Conservation and Recovery Act.

7) Route of Shipments (10 CFR 110.32(f)(5))

The expected route of imports is by rail or truck from the ports of entry at Seattle, WA, Metaline Falls WA and Sault Ste Marie, MI. Rail shipments will be direct to the 2025 Battelle Boulevard. Truck shipments will be primarily by interstate highway to WA route 240 and then to Stevens Drive to Battelle Boulevard.

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8) Ultimate Disposition of the Material (10 CFR 110.32(f)(5) and (6))

The imported material will be possessed and used in the United States in accordance with Perma-Fix Northwest's Washington Agreement State Licenses Number WN-10393-1 as amended and renewed from time to time. Perma-Fix Northwest will only import radioactive material if its Washington license is current or in timely renewal status.

Material that is not volumetrically contaminated and meets the procedures approved by the State of Washington for unrestricted release which currently are consistent with Regulatory Guide 1.86 may be released for unrestricted release or otherwise used by Perma-Fix Northwest in its operations. Volumetrically contaminated material under the Washington license conditions may be:

- 1) recycled after decontamination;
- 2) use for temperature control in the thermal processes in the case of contaminated liquids;
- 3) compacted, or
- 4) processed through thermal treatment.

Unrestricted Release and Conditional Release of material

Due to the relatively low activity of the imported material, it is anticipated that a portion of the material is either not contaminated or is only slightly contaminated such that the materials can be successfully decontaminated to meet the unrestricted release standards of Regulatory Guide 1.86. Any material that [1) does not meet the conditions for conditional release to a landfill, or 2)] cannot meet the unrestricted release standard after decontamination, will be

- 1) subjected to thermal treatment or
- 2) compacted or otherwise processed as waste.

Specifically, the material will be processed as follows:

- a) Imported material will be removed from shipping containers
- b) Material will be sorted and surveyed. Material that is not contaminated (i.e., meeting the conditions for unrestricted release) may be released to a clean recycler.
- c) Surficially contaminated material if meeting the conditions for unrestricted release after decontamination may be released to a clean recycler.
- d) The remaining material, i.e., volumetrically contaminated material and material with surficial contamination that cannot be decontaminated for unrestricted release, may be:
 - i) in the case of dry activated material be subject to sizing and supercompaction and thereafter be treated as waste;
 - ii) in the case of liquids, used for temperature control of thermal processes, or
 - iii) be subject to thermal treatment.
- e) Material that is not processed as provided under paragraphs b, c, and d above will be treated as waste.

Waste

Any imported material that is not released or processed in accordance with Washington license conditions will be returned to Canada under the proposed export license which is associated with this application. Appropriate processing for volume reduction, e.g., compaction and/or thermal treatment may be performed prior to return.

Residual radioactive material from processing the imported material such as floor sweepings, booties, slag, ash, decontaminated solution and abrasives that can be

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directly assigned to a Canadian generator will be combined with other waste from that generator. Residual material which cannot be directly assigned to a generator would be assigned to Perma-Fix Northwest under its procedures approved by the State of Washington and would be disposed of in accordance with Perma-Fix Northwest's procedures and applicable license conditions as approved by the State of Washington. In accordance with Perma-Fix Northwest's approved procedures, waste that is not identifiable to a generator or is commingled waste is attributable to Perma-Fix Northwest and is also considered by Washington to be waste generated by Perma-Fix Northwest and not its suppliers. Such waste is normally disposed of at US Ecology, Richland, Washington. Any imported Canadian waste that is not considered to be attributable to Perma-Fix Northwest will be returned for disposal under the proposed export license which is associated with this application. While Perma-Fix Northwest is unable to ascertain at this time the expected volume of waste associated with the import given the nature of Perma-Fix Northwest's business plan, there should not be significant volumes of waste resulting from the imported material that will be disposed of in the United States.

Perma-Fix Northwest will not import material until Canada has issued an import license to accept the return of any waste associated with the material imported to the US under this proposed license. This is also consistent with Perma-Fix Northwest's Washington license condition that requires in contracts the ability to return radioactive material processed or unprocessed to the supplier. Language similar to the following will be used:

Customer understands and acknowledges that Perma-Fix Northwest must, in accordance with its Washington Radioactive Materials licensees, retain the right to return Radioactive Waste (processed or unprocessed) to the generator. Therefore, Customer hereby represents, warrants and promises that it has the legal right and ability to accept, and will accept the return of Radioactive Waste (processed or unprocessed) to the generator facility. In addition, Customer represents, warrants, and promises that it has written assurance from the appropriate Radiological Control competent authority for such return of radioactive waste. Customer agrees to provide Perma-Fix Northwest, upon request, written evidence of its ability to accept any returned Customer radioactive waste in accordance with this Article.

This approach for waste has been discussed with and accepted by the Washington Department of Health and Environment, Division of Radiological Health. Processing performed in accordance with Perma-Fix Northwest's radioactive materials licenses requires no additional authorization beyond the NRC import and export licenses. This was again discussed on May 10, 2007, in discussion with the Licensing Section of the Washington Division of Radiological Health.

9) Justification of License (10 CFR 110.32(f)(7))

The dates for shipment will be based on the contract arrangements for individual shipments. The material imported under this license will assist in maintaining the US competitive advantage in decommissioning. It is consistent with international conventions entered into by the United States.

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ATTACHMENT 3

ADDENDUM TO EXPORT APPLICATION

1) Name and Address of Applicant (10 CFR 110.32(a))

Perma-Fix Northwest, Inc.
2025 Battelle Boulevard
Richland WA 99354

Contact:
Curt Cannon
Ph. 509-375-7052
Email: ccannon@perma-fix.com

2) Name and Address of Supplier of the Material (10 CFR 110.32(b))

Perma-Fix Northwest, Inc.
2025 Battelle Boulevard
Richland WA 99354

Contact:
Curt Cannon
Ph. 509-375-7052
Email: ccannon@perma-fix.com

3) County of Origin (10 CFR 110.32(c))

Canada

4) Name and Address of Ultimate Consignee (10 CFR 110.32(d))

Under this export license, waste generated from importation of contaminated material under the proposed US import license associated with this export application will result from multiple Canadian sources. The Canadian sources are not fully known at this time. The currently identified source is:

[REDACTED]

Business arrangements for other Canadian sources have either not been initiated or completed. Perma-Fix Northwest, Inc will supply this information in the form of a license amendment once such arrangements have been completed and, at least, 60 days in advance of any import that may generate the waste to be exported under this application. Consistent with the concept for a minor license amendment, exports under this license for future consignees will be enveloped by the provisions in this application. Consequently, it is expected that the only changes will be to this section of the application

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5) Dates of Proposed First and Last Shipment (10 CFR 110.32(e))

Shipments expected between 2007 and 2012. The first shipment will not begin until the proposed import license which is associated with this application is issued and waste is generated during the processing of the imported material. In addition, exports are dependent on obtaining Canadian import permits for the associated US imported waste. Perma-Fix Northwest, Inc will not import any waste for processing until Canada has issued an import license to allow waste associated with the particular import to be returned back to Canada. It is expected that there will be multiple import licenses issued by Canada during the duration of this proposed US import license.

6) Description of the Material (10 CFR 110.32(f) (1) and (5))

The material subject to this application is the material imported under the proposed import license which is associated with this application that was not recycled, burned, or otherwise released under Perma-Fix Northwest, Inc State of Washington license. At this time it is not possible to estimate the quantities, volume, and curies of the materials that will need to be exported. It will be a fraction of the imported amount. Consequently, the material to be exported will not exceed the following quantities which are specified in the associated import application:

<u>Material</u>	<u>Weight Pounds/ Kilograms</u>
Metals	
Ferrous Metal/ Non-Ferrous	2 Million / 0.9 Million
Dry Activity	
Burnable	7 Million / 3.2 Million
Non-burnable	1 Million / 0.45 Million
Liquids (aqueous and organic based)	1 Million / 0.45 Million

The radionuclides in the waste to be exported over the duration of the proposed license will not exceed the following limits which are 10 times the possession limits of Perma-Fix Northwest's Washington licenses WN-10393-1:

<u>Radionuclides</u>	<u>Ci/TBq *</u>
Atomic #1-83 (other than DAM/DAW) except:	3600/133
Co-60	400/14.8
Sr-90	40/1.48
Nb-94	75/2.77
Cd-113m	20/0.74
I-129	5/0.185
Eu-154	20/0.74
Pb-210	1/0.037
Source material	50,000 kgs total (16.7 curies if U-238)
Any other radioactive Numbers Atomic #84-103	

Round up to
134.0 TBq
total

0.618
TBq

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except SNM and Source Material

1/0.037 total, except Ra-226
- 5000 mCi (185,000 MBq)

≈
0.185TL

SNM

3500 grams U235 Equivalent
Not to exceed unity formula
quantities as specified in
WAC 246-220-010 under the
definition "Special nuclear
material in quantities not
sufficient to form a critical
mass."** Enrichment level is
not expected to exceed
5%. (as noted above this is
the amount over a five year
period, at no time will the
350 gram limit be exceeded)

≈
0.0003
TBq

* The above quantities are further limited by Washington license Condition 24 that provides that with the exception of Cs-137, possession limits cannot exceed the amounts needed for an emergency plan provided in WAC 246-235-150 which is equivalent to 10 CFR 30.72, 40.31(j), & 70.22(i). For purposes of the quantities to be imported over the period of the license, the quantities would not exceed 10 times the amount limited by Condition 24. (In the event that an updated Emergency Plan is put in place this condition may be exceeded if written approval is obtained from the Washington Department of Health.)
** WAC 246-220-010 is equivalent to 10 CFR 150.11

The chemical and physical form of the above isotopes may be in any form suitable for transport under US DOT regulations consistent with the limitations in Perma-Fix Northwest's Washington licensees.

It is expected that the exports will involve numerous shipments during the term of the license. No one shipment will exceed the values found in 10 CFR Part 110, Appendix P, Table I, Category 2. In addition, no one shipment will exceed 10% of the above limits consistent with the possession limits of Perma-Fix Northwest's current State of Washington Agreement State license.

Shipments may include one or more packages of material. However, the quantities of radioactive material in any one package will not exceed the Table A₂ values of 49 CFR 173.435.

In addition, the imported material will not exceed class A as defined in 10 CFR 61.55

7) Route of Shipments (10 CFR 110.32(f)(5))

The expected route of imports is by rail or truck to the ports of exit at Seattle, WA, Metaline Falls WA and Sault Ste Marie, MI. Rail shipments will be direct from the 2025 Battelle Boulevard. Truck shipments will be primarily by interstate highway from Battelle Boulevard by way of Stevens drive.

8) Ultimate Disposition of the Material (10 CFR 110.32(f)(5))

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The material exported under the proposed license will be returned to Canada, the country of origin. As noted above in section 5, Perma-Fix Northwest, Inc will not import any waste for processing until Canada has issued an import license to allow waste associated with the particular import to be returned back to Canada. Any waste returned to Canada will be stored and disposed of in accordance with the regulatory controls of Canada.

9) Justification of License (10 CFR 110.32(f)(7))

This license is needed to address waste generated from processing potentially contaminated metals to be imported under the proposed import license associated with this application. It is consistent with international conventions entered into by the United States.