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Office of Secretary
U.S. Nuclear Regulatory Commission
Washington DC 20555
Attn: Rulemaking and Adjudications

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Docket No. 11005711

Re: *EnergySolutions*' license import application

I would like to express my support for *EnergySolutions*' import application. The company has an exceptional record for safely handling waste materials and meets every applicable Commission and state requirement.

With more than 25 years of experience in environmental restorations and disposition, *EnergySolutions* is the industry leader in waste disposal. *EnergySolutions* not only operates with a distinct concern for public safety, but also a sensitivity to environmental safety.

In addition, I would like to highlight the fact that the Tennessee Division of Radiological Health has reviewed *EnergySolutions*' application and determined that the scope of work meets its current Tennessee licenses. *EnergySolutions* is committed to following the requirements set by the licenses it holds.

I strongly urge the Commission to approve the license application. *EnergySolutions* has proven that it is a responsible company that performs at the highest level in the industry.

Thank you for your consideration.

Mrs. Gillie Newcome

Template = SECY-043

SECY-02

IMPORT LICENSE FACT SHEET

EnergySolutions, Inc., a recognized world leader in the safe handling, packaging, and disposition of radioactive materials, has submitted an import license to the Nuclear Regulatory Commission (NRC) for importation of radioactive waste for disposition at its facilities in Tennessee and Utah. Radioactive materials are imported into the United States each year by many companies and through several U.S. ports (e.g., New Orleans, Charleston, Houston). In addition, highly enriched uranium (HEU) is imported annually into the U.S. for down blending. These materials, are imported, processed, handled, and dispositioned, safely and in accordance with all applicable laws and regulations.

Before a company can import material into the United States it must also undergo a rigorous licensing process at the NRC as outlined in Title 10 of the Code of Federal Regulations, Part 110. Part of this process includes a public comment period.

None of the material to be imported will exceed the NRC's low-level limits for shallow land disposal of radioactive waste. The bulk of the material is paper, plastic, wood, assorted metal, ion exchange resins and oils. The quantity of material is anticipated to be 200,000 cubic feet, on average, per year for 5 years. This represents just 2% of the material dispositioned each year at the two U.S. facilities.

Before any of the material leaves the host country the company shall ensure that all of the imported waste will meet the processing and disposition requirements of its licensed facilities in Tennessee and Utah by subjecting the material to an extensive waste characterization at the generator site. All material will be packaged and shipped in accordance with the requirements of the U.S. Department of Transportation and International Atomic Energy Agency regulations.

Any material imported from Italy will either be recycled, incinerated or otherwise processed using U.S. technology at the Bear Creek, TN facility. Only a small fraction of the material imported will be disposed in the U.S. Approximately 33% of all the material will be recycled. This material is primarily metal that will be melted and formed into shield blocks which will be sold and used throughout the nuclear industry. Approximately 67% will be processed at Bear Creek. Only about 8% of the total imported material is estimated to be disposed of at the Clive, Utah facility. This represents a very small fraction of the material received at Clive in a given year.

NRC's general practice, however, requires as a safety net that an export license be issued in concert for this type of import license. This is to ensure appropriate return pathways are available in the extremely unlikely event that the material does not meet the import license requirements. Because all of the material will meet the processing and disposition requirements of the U.S. licensed processing and disposition facilities, none of the material will require exportation to the host country.