

Hearing Docket

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**From:** Troy Eshleman [ESHLEMAN@energysolutions.com]  
**Sent:** Tuesday, June 10, 2008 2:09 PM  
**To:** Hearing Docket  
**Subject:** FW: Attached Image  
**Attachments:** 0034\_001.tif

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**From:** BCTN\_Admin\_CIR4080\_Scanner [mailto:BCTN\_Admin\_CIR4080\_Scanner]  
**Sent:** Tuesday, June 10, 2008 2:11 PM  
**To:** Troy Eshleman  
**Subject:** Attached Image

DOCKETED  
USNRC

June 11, 2008 (4:07pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Template = Secy-043

Secy-02

June 9, 2008

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

EnergySolutions  
Docket No. 110057

**Subject: Support for EnergySolutions' license application to import Italian waste.**

As the Operating Division Vice-President for the EnergySolutions Bear Creek facility in Oak Ridge, Tennessee, I would like to comment in support of the referenced import license application. The proposed scope of EnergySolutions services related to the Italian Waste Import/Export License is consistent with the facility historical operations and design considerations. Additionally I would like to highlight several technical issues that reinforce that safety is a key consideration by EnergySolutions:

1. Safety Record of the Facility

Response: The EnergySolutions Bear Creek Road Facility where the materials will be initially received and processed has been in operation for over 20 years processing similar wastes. The facility is constantly audited by customers, including some of the most conservative such as the US Navy and Department of Energy and inspected by various State and Federal agencies with not significant issues. We were recently qualified by the Tennessee OSHA Voluntary Protection Program Star Status (VPP – STAR). The workforce takes pride in safety performing contracted work, and the management team only contracts for work that can be safety and compliantly performed within our license parameters.

2. Support for Recycling

Response: The EnergySolutions Bear Creek Road facility has been recycling radioactive materials for US and International customers for more than 12 years. EnergySolutions and four other facilities worldwide recycle contaminated and activated metals. The proposed Italian Waste License includes greater than 50% of the mass as recyclable metals. This metal will be remanufactured into shielding, containers, and other products that will be reused in the nuclear industry avoiding the use of low-level waste disposal space somewhere in the world. Other radioactive metal recyclers worldwide release metal ingots for open commerce recycling, where EnergySolutions controls first user of recycled ferrous metals. In other parallel industries such as hazardous waste and solid waste management recycling is viewed as a positive solution, the NRC should

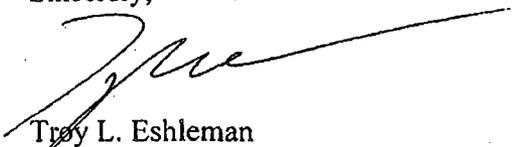
also recognize the positive contribution of recycling in radioactive waste management when reviewing the application.

### 3. Return of Non-Conforming Wastes

Response: Every EnergySolutions Bear Creek Road contract for waste processing services includes a provision for the return of processed and unprocessed wastes if they cannot be processed safely or to meet disposal site criteria. In addition to inspection of waste prior to departure from Italy, EnergySolutions maintains the contractual clauses and ultimately an Export License authorizations to return any waste deemed unsafe for recycling or disposition at the EnergySolutions Clive Utah Site.

As an employee at the Bear Creek facility, I am particularly proud of our recently achieved Tennessee OSHA Voluntary Protection Programs STAR status, we are one of only 26 companies in TN who qualify. The Italian waste proposed for processing here is identical to materials we have safely and effectively processed for over 20 years and we are undoubtedly the best trained, equipped, and effective facility in the world for such processing. I strongly urge the Commission to evaluate the license request on the solely on the basis of facts and peer-reviewed scientific bases.

Sincerely,



Troy L. Eshleman  
704 Colina Circle  
Knoxville TN 37922

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(148.184.100.43) with Microsoft SMTP Server id 8.0.751.0; Tue, 10 Jun 2008  
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Tue, 10

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X-MS-Has-Attach: yes

X-MS-TNEF-Correlator:

Thread-Topic: Attached Image

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From: Troy Eshleman <ESHLEMAN@energysolutions.com>

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Return-Path: ESHLEMAN@energysolutions.com

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