NRC FORM 7 U.S (8-2007) 10 CFR 110 APPLICATION FOI LICENSE, AMEN	DMENT, O	(PORT OR RE	/IMPORT	Estimate submitta are satis Services or by int Regulatc DC 205C OMB co	I is reviewed to ensified. Send commodified. Send commodified Branch (T-5 F52) ernet e-mail to inform Affairs, NEOB-13. If a means used	onse to comply sure that the ap- ents regarding U.S. Nuclear I collects@nrc.g 10202, (3150-00 I to impose an i NRC may not	with this mandatory plicable statutory, re burden estimate t Regulatory Commission, and to the Desi 27), Office of Mani offormation collection	EXPIRES: 06/30/2009 collection request: 2.4 hours. This significant and policy considerations to the Records and FOIA/Privacy sion, Washington, DC 20555-0001, c Officer, Office of Information and agement and Budget, Washington, in does not display a currently valid r, and a person is not required to	
PART A. FOR NRC USE O	PUBLIC OR			N-PUBLIC	DATE RECEIVED 8-21-08				
LICENSE NUMBER /WO26		DOCKET	NUMBER 106	760		ADAMS AC	CESSION NUM	BER	
PART B. TO BE COI	MPLETED F	OR AL	L LICENSE ne items, use f	S, AMEND Pages 3-4 first	MENTS, R and then att	ENEWA	LS OR NO	TIFICATIONS ecessary.)	
1. NAME AND ADDRESS OF APPLICATE UniTech Services Grou	1. NAME AND ADDRESS OF APPLICANT/LICENSEE		1a. NAME OF APPLICANT'S CONTACT  Glenn Roberts			1b. APPLICANT'S REFERENCE NUMBER  Laguna Verde			
295 Parker Street	-P,		1c. PHONE N	JMBER	.:	1d. F	1d. FAX NUMBER		
				(610) 948	-9700		(610) 948-1217		
Springfield, MA 01151			1e. E-MAIL AD	DRESS					
			1		GRober	ts@Uni	Fech.ws		
2. TYPE OF ACTION REQUESTED	(Check One)	1 2	/						
(Parts B, C, E) EXPOI INCIDE RADIO		(	MPORT Parts B, D, E)		BINED EXPO BB, C, D, E)	RT/IMPOR	1 1	NDMENT/RENEWAL ing License Number:	
3. CONTRACT NUMBER(S)	4. FIRST SHIP	MENT DAT	E	5. LAST SHIPMENT DATE			6. PROPOSED EXPIRATION DATE		
Pending	0:	1/01/20	09	1	2/31/2011	12/31/2011		2/31/2011	
PART C. TO BE COMPLE (If more space is nee 7 NAME(S) / ADDRESS(ES) OF SUPP AND/OR OTHER PARTIES TO THE I Entire Part C is not	ded to complet	te any of the	ne items, use l	Pages 3-4 first ES) OF INTERM	, and then att	ach addition	nal sheets, if n	ecessary.) S) OF ULTIMATE	
applicable.									
7a. FUNCTION(S) PERFORMED/SERVICE(S	) PROVIDED	8a. INTERM	MEDIATE USE(S)			9a. ULTIMAT	E END USE(S)		
10. DESCRIPTION OF RADIOACTIVE NUCLEAR FACILITIES, EQUIPMEN NUCLEAR EQUIPMENT INCLUDE EQUIPMENT FOR EXPORT	IT, OR COMPON	NENTS; FO	R	a. MAX TOTAL ELEMENT W TOTAL ACTI	GT (KG), OR	10b. MAX E OR W	ENRICHMENT GT %	10c. MAX ISOTOPE WGT (KG)	
								100 200 CD	
11. FOREIGN OBLIGATIONS (BY COU	NTRY AND BY F	PERCENTA	GE OF MAXIMU	JM TOTAL VOL	UME)	<u> </u>	NE	100 2000 pp	

NRC FORM 7 (8-2007) 10 CFR 110

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U.S. NUCLEAR REGULATORY COMMISSION

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LICENSE NUMBER DOCKET NUMB	NAME	ADAMS ACCESSION NUMBER	PUBLIC OR		
/wo26 1/00°	5 <i>760</i>		PUBLIC OR	NON-PUBLIC	
PART D. TO BE COMPLETED FOR I					
12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT	13. NAME(S) / ADDRI CONSIGNEE(S)	ESS(ES) OF INTERMEDIATE	14. NAME(S) / ADDRESS(ES CONSIGNEE(S)	) OF ULTIMATE	
Comisión Federal de	Noi	ne	UniTech Service	es Group, Inc.	
Electricidad			295 Parker Street		
Km. 42.5 Carretera			Springfield, MA 01151		
Cardel-Nautla	4				
Veracruz, VER, Mexico					
12a. NRC EXPORT LICENSE NUMBER(S)	13a. LICENSE NUMB	ER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) /	EXPIRATION DATE(S)	
(if applicable)			03-5291 / Marc	ch 10, 2010	
Not applicable	N/				
	13b. INTERMEDIATE	USE(S)	14b. ULTIMATE END USE(S	<u> </u>	
			PVA Laundry Dissolution		
	N.A	<b>1</b>			
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SE NUCLEAR FACILITIES	ALED SOURCES,	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c. MAX ISOTOPE WGT (KG)	
See attached.		See attached.	See attached.	See attached.	
				1	
				0.00	
				100 2/2	
				( ) (V)	
16 FOREIGN OBLIGATIONS (BY COUNTRY AND BY F None known.	PERCENTAGE OF MA	XIMUM TOTAL VOLUME)			
PART E. TO BE COM	PLETED FOR A	LL LICENSES, AMEND	MENTS, OR RENEW	ALS	
17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS?	YES NO	17a. COPIES OF RECI AUTHORIZATION		YES 🗸 NO	
		hereby certify that this appl nat all information provided			
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFIC	CIAL	18b. SIGNATURE AUTHORIZ	ED OFFICIAL	18c. DATE	
Glenn Roberts, Health Physicis	s <b>t</b>	Al Robert	<del>\</del>	08/19/2008	

NRC FORM 7 (8-2007) 10 CFR 110 U.S. NUCLEAR REGULATORY COMMISSION

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

				<u> </u>	
LICENSE NUMBER	DOCKET NUMBER	ADAMS ACCESSION NUMBER			
$/\omega o_{\alpha}$	11005760		PUBLIC	OR NON-PUBI	_IC
7 40.	1/ /				

ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

Additional information provided pursuant to above items and 10 CFR §110.32.

10 CFR §110.32(c) - Country of origin: Mexico. The Laguna Verde Nuclear Power Station is owned and operated by the Mexican government. It is expected that 25-30 shipments per year may occur over the next three years.

Form 7, Item 15, Description of the materials: The materials will be comprised of Polyvinyl alcohol (PVA) based items, largely protective clothing. The nuclides will include several activation and mixed fission products. Typical nuclides include: Co-60, Mn-54, Fe-55, Ni-63, Cs-137. The shipments are expected to be transported in 40 foot sea-land containers. Activities may range from 0.000001 TBq (a fraction of a millicurie) up to 0.0037 TBq (100 millicuries). It is UniTech's experience that the bulk of shipments will be in the 0.0001 to 0.001 (approximately 3.7 to 37 millicurie) range. The shipments will be solid materials. The physical and chemical form of most contaminants is solid particulate metal oxides. Other chemical compounds may be present; for example cesium is most often present as cesium chloride. Very small quantities of special nuclear material (SNM) and transuranic (TRU) nuclides may be present; the total amount in terms of activity is typically much less than one percent. Enrichment does not typically exceed five percent. No tracking and reporting of SNM pursuant to NUREG/BR-0006 and NRC Form 741 is expected. Activities shall be much less than Threshold Limits specified in Appendix P to Part 110 - Category 1 and 2 Radioactive Material.

Given the natural of nuclear power plant shipments, broad scope license authorizations are required. UniTech is not seeking any increase to maximum possession limits currently specified in its domestic license; such limits are incorporated by reference into the current Import License IW-019R, as detailed on page 5 of our August 17, 2006 application.

10 CFR §110.32(f)(6) - The industrial process generating the materials is the use of protective clothing and launderable items worn or used in a nuclear power plant environment. If classified as waste in accordance with 10 CFR §61.55, the material would be Class A, unstable. The materials will be dissolved by way of laundering in accordance with UniTech's domestic license. Residual waste associated with the decontamination laundry process becomes UniTech's secondary waste and is sent by UniTech to a licensed waste processor for ultimate disposal in accordance with the processor's license. Secondary wastes include filtration media, and residual components from the dissolvable products. It should be noted that, as with US customers, laundry shipments are not manifested as shipments of low-level radioactive waste, and UniTech's process wastes are not attributed to the nuclear power plants shipping laundry. Accordingly, no special agreements with processing facilities or waste compacts need to be addressed. The processed materials are not different and will be received and handled in the same fashion as material from our current domestic customers.



August 19, 2008

Margaret M. Doane
Deputy Director
Office of International Programs
U.S. Nuclear regulatory Commission
11555 Rockville Pike
Rockville, MA 20852

RE: Amendment of XW-011R I WO/9-R

Dear Ms. Doane:

Enclosed is an application from UniTech Services Group, Inc. (UniTech) to amend its referenced Import License. The amendment is needed in support of efforts to provide to provide laundry services to the Laguna Verde nuclear power plant in Vera Cruz, Mexico. The contract is anticipated to be awarded late this calendar year. Any attention that may be provided in advance of that time will be appreciated and is respectfully requested.

While this application specifies polyvinyl alcohol clothing, it is likely that the contract may also include conventional laundry services. Conventional laundry will be processed in accordance with UniTech's long standing practices; that is, a Notification of activities conducted under general license will be submitted prior to commencement of said activities.

UniTech recognizes that we have requested an expiration date beyond that of our domestic license. UniTech hereby affirms that it will not import and receive any materials unless its domestic license is renewed or its renewal application has been deemed timely; thereby extending the license until final action is taken. As a final note, the MA DPH license includes authorization, by reference to submitted documents, for PVA dissolution.

If you have any questions, please do not hesitate to contact me at your earliest convenience. I may be reached directly at 610-948-9700, extension 19, or by email at <a href="mailto:GRoberts@UniTech.ws">GRoberts@UniTech.ws</a>.

A See Email Dated 8-27-08

Sincerely,

UniTech Services Group, Inc.

Glenn Roberts

Health Physicist

Enclosure: Form 7 Amendment Application, Check No. 268782 for \$9800

## **Robin Barnes**

From:

Glenn Roberts [GRoberts@UniTech.ws] Wednesday, August 27, 2008 11:04 AM

Sent:

Robin Barnes

To: Cc:

Janice Owens: 'Michael Fuller'

Subject:

RE: Application and Docket Numbers (Reference: Appl Dtd 8/19/08)

Robin / Janice,

UniTech will accept the terms stated in your below email. We appreciate any continued expedited attention either of you might devote.

Thank You.

Glenn

Glenn Roberts
Health Physicist
UniTech Services Group, Inc.
610-948-9700, x19

From: Robin Barnes [mailto:Robin.Barnes@nrc.gov]

**Sent:** Tuesday, August 26, 2008 1:54 PM

**To:** Glenn Roberts **Cc:** Janice Owens

Subject: Application and Docket Numbers (Reference: Appl Dtd 8/19/08)

August 26, 2008

Dear Glenn,

The Office of International Programs (OIP) received your application (dated August 19, 2008) along with your check #268782 for \$9,800.00 to amend your existing import license number IW019-R.

However, after careful consideration, OIP's management recommends assigning your application with a new license and docket number rather than amending the existing IW019 license. The fee structure remains the same for either scenario - both cost \$9100.00.

Note: Due to NRC's Fee Schedule change as of August 5, 2008, your check is an overpayment of \$700.00. Once processing begins, OCFO will be sending UniTech a refund check in a few weeks.

Ms. Janice Owens is assigned to review and evaluate applications for licenses involving proposed imports of radioactive waste for accuracy and conformance to all licensing conditions, regulations, and statutory requirements. Ms. Owens can be reached on (301) 415-3684.

**License No. IW026 and Docket No. 11005790** have been assigned to your application. Please refer to these numbers when inquiring about the status of your application.

The letter to the Executive Branch requesting assistance in notifying the Mexican Government and obtaining comments from interested Executive Branch agencies in the context of the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management will be forthcoming. In addition to preparing the letter to the Executive Branch, we will also be preparing a notice of this proposed import for publication in the *Federal Register* and will be forwarding copies of the application to NRC technical staff for

review and officials in the State of Massachusetts for information. It can take anywhere from approximately **one to four months or more** for interested foreign and U.S. officials to complete their reviews.

Copies of the application and the letter(s) to the Executive Branch will be available electronically through NRC's Agencywide Document Access Management System (ADAMS) and can be accessed through the Public Electronic Reading Room (PERR) link, <a href="www.nrc.gov/reading-rm/adams.html">www.nrc.gov/reading-rm/adams.html</a>, the NRC Homepage.

In order to begin processing your application, would you be so kind as to respond to this email by accepting the above terms. OIP will use your current application, but will slightly alter the language to no longer reflect this as an amendment to IW019, but as a brand new import waste case application.

Please feel free to contact me should you have any further questions.

Thank you for your application, and I look forward to working with you.

Robin K. Barnes
Licensing Assistant
Export Controls and International Organizations
Office of International Programs
Mail Stop 04-E21
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

WK: 301-415-3433 FX: 301-415-2395

Email: Robin.Barnes@nrc.gov