

1W025

Northwest Interstate Compact

On Low-Level Radioactive Waste Management

P.O. Box 47600. Olympia, Washington 98504-7600. (360) 407-7102. Mike Garner, Executive Director

October 29, 2008

Mr. Stephen Dembek, Branch Chief
Export Controls and International Organizations
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Application for NRC Import License (IW025)

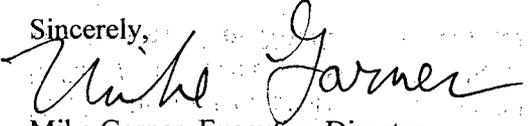
Dear Mr. Dembek:

Thank you for the opportunity to comment on Eastern Technologies, Inc. import license application (IW025). Eastern Technologies, Inc. is seeking authority to import contaminated polyvinyl alcohol protective clothing from the Angra 1 Nuclear Power Plant in Brazil. The materials became contaminated during a steam generator replacement at the Brazilian utility. The application states that any waste resulting from the processing of the contaminated protective clothing will be shipped to the Clive, Utah facility for disposal.

At its May 2008 meeting the Northwest Compact Committee made it clear through its adoption of the "Clarifying Resolution" that no "arrangement" is in place, as required by the Compact's regulations, that provides access to the region for disposal of foreign low-level wastes. This includes foreign-generated waste that is characterized as domestic waste by another interstate compact or unaffiliated state. The Third Amended Resolution and Order serves as an "arrangement" specifically with other interstate compacts and unaffiliated states.

The Northwest Compact has issues with the import license application of Eastern Technologies, Inc. as it would result in Brazilian waste being shipped to the Clive, Utah facility for disposal. **This would be in violation of the regulations of the Northwest Interstate Compact.**

I would like to thank you for allowing me to defer my response until after the October meeting of the Northwest Compact Committee. Should you have any questions regarding my response please contact me at (360) 407-7102.

Sincerely,

Mike Garner, Executive Director
Northwest Interstate Compact

cc: Northwest Compact Committee