

NRC FORM 7 (8-2007) 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 8-13-09
LICENSE NUMBER XW016	DOCKET NUMBER 11005825	ADAMS ACCESSION NUMBER

PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR NOTIFICATIONS
 (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 Eastern Technologies, Inc. P.O. Box 409 215 2nd Ave. Ashford, AL 36312	1a. NAME OF APPLICANT'S CONTACT <p style="text-align: center;">Mark Fellows</p>	1b. APPLICANT'S REFERENCE NUMBER <p style="text-align: center;"><i>Appl. Dtd. 8-3-09</i></p>	1c. PHONE NUMBER <p style="text-align: center;">(334) 899-4351</p>	1d. FAX NUMBER <p style="text-align: center;">(334) 899-2310</p>
1e. E-MAIL ADDRESS <p style="text-align: center;">mfellows@easterntechnologies.com</p>				
2. TYPE OF ACTION REQUESTED (Check One) <input checked="" type="checkbox"/> EXPORT (Parts B, C, E) <input type="checkbox"/> NOTIFICATION OF EXPORT OF INCIDENTAL RADIOACTIVE MATERIAL (PART C, E) <input type="checkbox"/> IMPORT (Parts B, D, E) <input type="checkbox"/> COMBINED EXPORT/IMPORT (Parts B, C, D, E) <input type="checkbox"/> AMENDMENT/RENEWAL Existing License Number: _____				

3. CONTRACT NUMBER(S) N/A	4. FIRST SHIPMENT DATE 02/01/2010	5. LAST SHIPMENT DATE 12/31/2012	6. PROPOSED EXPIRATION DATE 12/31/2012
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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 Mark Fellows Eastern Technologies, Inc. 215 2nd Ave. Ashford, AL 36312	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) N/A	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S) <i>Comision Federal de</i> CFE - Central Laguna Verde, Km. 42.5 Carretera <i>Electricidad</i> Cardel-Nautla, Veracruz, VER Mexico Atn: Ing. Sergio Zorrila Romero
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7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED Dissolve/Decontamination	8a. INTERMEDIATE USE(S) N/A	9a. ULTIMATE END USE(S) Storage
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10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS; FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT The material to be exported is the secondary waste resulting from dissolving and decontamination of PVA dissolvable protective clothing and related items. See page 3 for additional description.	10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) See additional information on page 3	10b. MAX ENRICHMENT OR WGT % N/A	10c. MAX ISOTOPE WGT (KG) N/A <i>Rec'd 8-5-09</i> <i>PD</i>
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11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) N/A	NONE
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NRC FORM 7
(8-2007)
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

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

LICENSE NUMBER <i>XW016</i>	DOCKET NUMBER <i>11005825</i>	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)	14. NAME(S) / ADDRESS(ES) OF ULTIMATE CONSIGNEE(S)	
12a. NRC EXPORT LICENSE NUMBER(S) <i>(if applicable)</i>	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c. MAX ISOTOPE WGT (KG)

16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)

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
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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 Mark Fellows Vice-President	18b. SIGNATURE - AUTHORIZED OFFICIAL <i>Mark Fellows</i>	18c. DATE 08/03/2009
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8-5-09
RB*

NRC FORM 7
(8-2007)
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

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

LICENSE NUMBER <i>XW016</i>	DOCKET NUMBER <i>11005825</i>	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 sheets for additional information.

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8-5-09
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XW016
11005825

ATTACHMENT 1

§110.32 Information required in an application for a specific license/NRC Form 7.

- (a) Name and address of applicant.

Eastern Technologies, Inc.
Attn: Mark Fellows, Vice-President
P. O. Box 409 (Mailing Address)
215 2nd Ave. (Physical Address)
Ashford, Alabama 36312

- (b) Name and address of supplier of equipment or material.

The material to be exported will be supplied from:
Eastern Technologies, Inc.
215 2nd Ave.
Ashford, Alabama 36312

- (c) Country of origin of equipment or material, and any other countries that have processed the material prior to its import into the U.S.¹

Country of Origin - Mexico

- (d) Names and addresses of all intermediate and ultimate consignees, other than intermediate consignees performing shipping services only.

All material to be exported will be shipped directly to:

Comisión Federal de Electricidad
Central Laguna Verde
Km. 42.5 Carretera Cardel-Nautla
Veracruz, VER
Atn: Ing. Sergio Zorrilla Romero

- (e) Dates of proposed first and last shipments.

It is anticipated that the first shipment of material for export may occur in mid to late first quarter 2010. It is also anticipated that an agreement between Laguna Verde and ETI for dissolvable

(Note: This is meant to include all obligations attached to the material, according to the definition of obligations in §110.2. Licensees must keep records of obligations attached to material which they own or is in their possession.)

Rec'd
8-5-09
RB

YW016
11005825

protective clothing products and dissolving and decontamination of Polyvinyl alcohol (PVA) based products would be for a 3 year duration ending in December 2012. Shipments of material to ETI for processing will occur periodically throughout this time frame. Return shipments (exports) will be scheduled to support the operational needs of the Laguna Verde nuclear generating station.

(f) Description of the equipment or material including, as appropriate, the following:

(1) Maximum quantity of material in grams or kilograms (curies for byproduct material) and its chemical and physical form.

As described in the initial application for license IW016, used dissolvable protective clothing and related items will be transported to ETI for processing in 40' sealand containers (or two 20' containers). Typically such a container of material will have a total activity ranging from less than one (1) millicurie to one-hundred (100) millicuries of corrosion activation products and mixed fission products. The total activity present in any given shipment is dependent on the levels of contamination present on the clothing. The activation products, such as Co-60, Co-58, and Mn-54, typically comprise the predominate radionuclides. The used protective clothing products are in a solid form and are typically fabricated from polyvinyl alcohol. The radioactive contaminants are typically in the form of small, solid particulate metal oxides.

The total amount of radioactivity that can be received at the ETI facility per the facility license issued by the State of Alabama is 2.5 Curies for isotopes with atomic number 1 to 83, and 20 millicuries for isotopes with atomic number 84 to 101 (except source or special nuclear material). The facility limits on total activity applies to material received from all sources. ETI currently receives similar material from about 50% of the commercial nuclear power plant sites in the U.S. and manages the material to stay well below the limits on total activity. The material to be imported from Mexico will not add appreciably to the total amount of radioactive material currently managed at the ETI facility at any given time.

(2) For enriched uranium, the maximum weight percentage of enrichment and maximum weight of contained U-235.

Rec'd
8-5-09
RB

XW016
11005825

N/A

- (3) For nuclear equipment, total dollar value.

N/A

- (4) For nuclear reactors, the name of the facility and its design power level.

N/A

- (5) For proposed exports or imports of radioactive waste, and for proposed exports of incidental radioactive material -- the volume, classification (as defined in §61.55 of this chapter), physical and chemical characteristics, route of transit of shipment, and ultimate disposition (including forms of management) of the waste.

The used dissolvable protective clothing and related items will initially be imported from Laguna Verde under USNRC License No. IW016 and received at the ETI facility located in Ashford, Alabama under the radioactive materials license issued to ETI by the State of Alabama. This License authorizes ETI to collect and treat polyvinyl alcohol (PVA) based items and manage associated decontamination wastes.

The residual material to be exported to Mexico for return to Laguna Verde originates from shipments of used protective clothing and related products shipped to ETI from Laguna Verde for dissolving. Incoming shipments are in a 40' sealand (or two 20' seavans) and will comprise up to 2080 ft³ of material with a mass ranging from about 5,000 lbs to 12,000 lbs depending on the amount loaded and the efficiency of packing the sealand container. The secondary waste resulting from dissolving PVA products includes decontamination process filters and residual components from dissolvable products. Normally residual waste associated from the decontamination processes become ETI's secondary waste and is sent by ETI to a third party, licensed waste processor and are ultimately disposed of at the Clive, Utah radioactive waste disposal site. However, in the case of the material from Laguna Verde, the secondary waste material will be segregated from other customers so that it can be returned to Laguna Verde. Following

Rec'd
8-5-09
RB

XW016
11005825

processing at the ETI facility, the secondary waste resulting from the Laguna Verde material will be shipped to Impact Services, a licensed waste processing facility located in Oak Ridge, Tennessee. Impact Services will further volume reduce the material and return it to ETI for eventual export to Laguna Verde. It is anticipated that each 40 ft (or two 20' seavans) of used dissolvable clothing imported from Laguna Verde will result in approximately 1.2 cubic feet of residual material to be exported to Laguna Verde. Based on this volume resulting from a single shipment imported from Laguna Verde, it is anticipated that no more than 1 to 2 55 gallon drums of secondary waste will be returned to Laguna Verde each year. For each 40' (or two 20') containers received, the activity in the secondary waste to be returned to Laguna Verde will be less than or equal to the initial activity shipped to ETI, as described in section f(1) above.

If similar material were being transported for land disposal, it would be classified as Class A as defined in 10CFR Part 61, Paragraph 61.55. The physical and chemical characteristics of the material are the same as described in (f)(1), above.

Shipments will be via highway with the exact routing to be established prior to each shipment.

- (6) For proposed imports of radioactive waste -- the industrial or other process responsible for generation of the waste, and the status of the arrangements for disposition, e.g., any agreement by a low-level waste compact or State to accept the material for management purposes or disposal.

N/A -- this license application is for export.

- (7) Description of end use by all consignees in sufficient detail to permit accurate evaluation of the justification for the proposed export or import, including the need for shipment by the dates specified.

The Laguna Verde Nuclear Power Station will be the consignee for this material and will store the material onsite. All material exported by ETI to Laguna Verde originated at the Laguna Verde facility. PVA products will be treated to dissolve the PVA material. The dissolved PVA is

Rec'd
8-5-09
RB

W016
11005825

subsequently decontaminated and released to the environment in accordance with regulatory limits incorporated in the ETI license. Shipments will occur periodically over the duration of the commercial agreement between Laguna Verde and ETI and will be scheduled at times mutually agreeable to ETI and the Laguna Verde Station. It is anticipated that only 1 to 2 shipments per year may be required to return the residual material to Laguna Verde.

Rec'd
8-5-09
RB



*IW016
11005825*



August 3, 2009

Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Application for License for Import of Radioactive Material

Dear Deputy Director:

Pursuant to 10 CFR Part 110, Paragraph 110.31, I am writing to submit an Application for a License to Export Radioactive Material. My company, Eastern Technologies, Inc. (ETI), possesses a license to import radioactive material (reference IW016) from the Laguna Verde nuclear power plant located in Veracruz, Mexico. The material imported from Laguna Verde is in the form of used contaminated dissolvable protective clothing. Following treatment of the used protective clothing at our facility in Ashford, Alabama, any residual or secondary material resulting from the process will be segregated and returned (exported) to Laguna Verde. The secondary material to be returned consists of components of the clothing that do not dissolve (e.g., zippers, hook & loop material, elastic, etc.) along with the process filters used to decontaminate the dissolved clothing.

To facilitate your review of our export license application, a completed NRC Form 7 is enclosed with this letter. Additionally, the information required pursuant to 10 CFR Part 110, Paragraph 110.32, "Information required in license application for specific license," is included as an Attachment to the Form 7.

Also, per my letter to your office dated September 26, 2008, I requested an amendment to our Import License IW016 to extend the expiration date to December 31, 2012. We were subsequently notified in a letter from the NRC dated January 9, 2009 from Mr. Stephen Dembek that review of the request for an amendment to IW016 was held in abeyance due to issues associated with access to the Clive, Utah disposal site for the final disposition of waste originating in foreign countries. Based on submittal of the application for a license to export the residual material back to the Laguna Verde plant, we request that you proceed with the review of our request for an amendment to extend the expiration date for IW016 with the understanding that the final disposition of the secondary waste remaining following the dissolving and decontamination process will be to export the remaining material back to Laguna Verde.

Eastern Technologies, Inc.

P.O. Box 409 ♦ 215 Second Avenue ♦ Ashford, AL 36312

334-899-4351 ♦ 800-467-0547

www.OREX.com ♦ www.easterntechnologies.com

*Rec'd
8-5-09
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W016
11005825

I have enclosed a check in the amount of \$9100.00 for payment of the license application fee as required by 10CFR Part 110, Paragraph 110.31(b) and the fee schedule in 10CFR Part 170, Paragraph 170.31, Category 15.D.

If you have any questions regarding this application or require additional information, please contact Mr. Douglas Kay, our company technical contact for this project, at 817-559-0506. You may also contact me at 334-899-4351 or at the address listed below.

Sincerely,



Mark Fellows
Vice-President
Eastern Technologies, Inc.
P.O. Box 409
Ashford, AL 36312

Enclosures

Rec'd
8-5-09
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11005825

Barnes, Robin

To: Mark Fellows
Subject: RE: Waste Export License Application

August 13, 2009

Dear Mark,

Okay--thanks!

Then, I'll just make your entire application publicly available and not redact anything.
Robin

From: Mark Fellows [mailto:mfellows@easterntechnologies.com]
Sent: Wednesday, August 12, 2009 4:01 PM
To: Barnes, Robin
Cc: 'Doug Kay'
Subject: Waste Export License Application

Mrs. Barnes,

Upon further review of the application I am retracting my request to redact any portion of our current waste export license application. Thanks so much for your assistance.

Mark Fellows
Vice President
Eastern Technologies, Inc.
334-899-4351 (Office)
334-797-9244 (Cell)

OREX...the technology you wear.
ETI...the service you deserve.

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