



# International Isotopes Inc.

July 12, 2010

Document Control Desk  
Ms. Vonna Ordaz, Director  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Request to Extend Expiration Date - Use of DOT Specification 20WC-5 Package Safety Evaluation Report No. 71-9345

Dear Ms. Ordaz,

As a result of delays reflected in the schedule provided below, International Isotopes, Inc. (INIS) requests to extend the authorization to utilize the DOT Specification Package 20WC-5, as described in Safety Evaluation Report Docket No. 71-9345, from September 30, 2010 until December 31, 2011. This extension is necessary to support continued Co-60 source manufacturing activities until the AOS-100 replacement container is available. Should the extension be granted we would request that the total shipments authorized by the special permit to be 16.

ACTIVITY	STATUS	SCHEDULE	
		EXPECTED	ACTUAL
Design	The design was completed for the OCT07 submittal to the NRC. Comment received by the NRC on FEB08 did not have any impact on the design. The only design characteristic impacted was the material selection for the elastomeric seals.	1 OCT 07	1 OCT 07
Testing	All required testing was completed for the OCT07 submittal. No additional testing requirements have been identified as a result of NRC' responses to date.	30 MAR 07	30 MAR 07
Application	Safety Analysis Report (SAR) submitted to the NRC.	1 NOV 08	23 JUN 09
	Response to RSI's.	14 SEP 09	14 SEP 09
	Response to RAI's.	4 OCT 10	
Certification	It is expected to receive the Certificate 6-12 months from RAI Response date.	1 APR 11	
Production	AOS is planning to begin production as soon as there is indication that the design will be licensed. It is expected to complete production of the packaging within 6 months.	1 OCT 11	

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To date INIS has utilized the 20WC-5/2R under DOT Special Permit No. 14728 without incident on seven occasions as follows:

12/02/2008	01/05/2010
12/22/2008	05/26/2010
03/11/2009	05/04/2010
09/01/2009	

In each of the above instances International Isotopes Transportation Services acted as the motor carrier.

While containers are expected to be available by October 1, 2011, we are requesting an extension to December 31, 2011 to provide sufficient time for the Department of Energy to evaluate the package and authorize its use in the Advanced Test Reactor.

A similar request has been submitted to the US Nuclear Regulatory Commission.

Please contact me at 208 524-5300 or via email at [jjmiller@intisoid.com](mailto:jjmiller@intisoid.com) if you have questions regarding this request.

Sincerely,



John J. Miller, CHP  
Radiation Safety Officer  
International Isotopes, Inc.

Copy:

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