

January 13, 2011

Jenny Wollenweber
Export Licensing Officer
Export Controls and International Organizations
Office of International Programs
US Nuclear Regulatory Commission
Washington DC 20555-0001

Subject: Additional Information License Application IW028

Reference: (1) E-mail from Jennifer Wollenweber (NRC) to Robert Sharkey, "Application for Import of Waste from Canada (IW028)", dated January 5, 2011

Enclosures (I) Response to Request for Additional Information (IW028)

Dear Ms. Wollenweber:

Enclosure I provides a response to your questions provided by e-mail in reference 1 and discussed during a telephone conference between ALARON, MMA/OSM and the NRC on January 5, 2011.

Please contact me or Bill Sharkey at 860-651-1883 or Robertsharkey@mm-a.com if you have any questions or require further information.

Sincerely,



David Sharpe

President

Oregon Specialty Metals Inc.

Enclosure I
Application for Import of Waste from Canada (IW028)

Q1 On the application, it appears that 186,000 kg is to be returned to the United States but that 561,347 kg of waste remain in Canada, why isn't all of it being returned?

Response: The difference (~375,000 kg) between the 561,347 kg sent to MMA from the US and the approximately 186,000 kg scheduled for return to the US represents the quantity of material that was processed and released in Canada. Note that this 375,000 kg of material would likely have been disposed of as LLRW if not processed in Canada.

Q2 From previous discussions, processing/consolidation will occur under Alaron's Pennsylvania State license so why did Oregon Specialty Metals apply for the license not Alaron?

Response: OSM is the US business of MMA. The actual processing contract is between MMA and Alaron. The reason for having OSM as the license holder was that it needs to be a US company by NRC regulation and MMA/OSM wishes to maintain control of the license. Alaron has access to any requested records associated with the material.

Q3 What are your definitions of "primary" and "secondary" waste? What are the approximate amounts of each?

Response: In the context used in the application, primary waste means original material sent to MMA which was primarily metals. Secondary waste means waste generated from the decontamination of metals and includes the protective clothing used, filter cake from the acid cleaning process and abrasive shot used to clean the metals. The material called secondary waste in Canada was controlled by contract and was not comingled with other facilities' waste. Each package of MMA secondary waste can be directly attributed to a specific American generator (see response to Q4). For the purpose of this import and the processing at Alaron all of the waste is considered primary and directly attributable to one of the US origination facilities. 100 percent of the waste will be primary waste when handled at the ALARON facility whose activities are essentially to consolidate and repackage the waste for shipment to disposal.

Q4 Is there any documentation or verification available that the "secondary waste" resulted solely as a result of work performed on these four waste streams?

Response: Each container of material is labeled and traceable to the originator and neither the processed or unprocessed material has been co-mingled. OSM and Alaron have access to MMA records to verify the origin and treatment of the material.

Q5 Due to the origin, the Areva-Richland materials are not eligible for disposal at the Clive, Utah facility, is there documentation that the four waste streams have been kept separate at MMA?

Response: The waste stream that originated from the Areva-Richland facility will be disposed of at the Richland, WA facility since the Energy Solutions site is not authorized to receive the material. As discussed above the containers are traceable to the originators facility and have not been comingled.