

## **Northwest Interstate Compact**

On Low-Level Radioactive Waste Management

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

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April 27, 2012

Ms. Jenny Wollenweber  
Export Licensing Officer  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

RE: Import/Export License Applications IW031 and XW019

Dear Ms. Wollenweber:

I would like to thank the U.S. Nuclear Regulatory Commission for its March 16, 2012 letter describing Perma-Fix Northwest Richland Inc. (PFNW) import and export license applications (IW031 and XW019). The import license would provide for importation of up to 500 tons of radioactively contaminated combustible materials from the Laguna Verde Nuclear Power Plant (LVNPP) in Mexico starting in 2012 and running through March 31, 2017. PFWN will thermally process this material for volume reduction. The ash resulting from thermal processing, the containers used to ship the material to PFWN, as well as any non-conforming material not valid for alternate processing will be shipped back to LVNPP in Mexico.

The import license allows for any non-conforming waste or difficult to process material to be transferred to an alternate authorized processing facility managed by Perma-Fix. It is my understanding following a discussion with Mr. Paul Hickman, Regional Sales Manager for Perma-Fix Environmental Services, Inc., that any waste requiring treatment at an alternate Perma-Fix facility will primarily consist of mixed low-level radioactive waste. All waste resulting from treatment at another Perma-Fix facility as well as the containers used to ship this material will be returned to PFWN for return to LVNPP in Mexico as provided for by the export license.

The Northwest Compact does not have an issue with the requested import and export licenses provided all the following materials are returned to LVNPP in Mexico:

1. All waste resulting from treatment at either PFWN or other Perma-Fix managed facilities.
2. All containers used to ship the material to PFWN or other Perma-Fix facilities that are not reused or recycled.
3. All non-conforming materials.

Under the rules of the Northwest Compact, the resulting waste, non-conforming materials, and shipping containers will not have disposal access to either the Richland, Washington or Clive, Utah commercial disposal facilities.

Thank you for providing the Northwest Compact with the opportunity to comment on these license applications. If you have questions, please contact me at (360) 407-7102.

Sincerely,



Mike Garner, Executive Director  
Northwest Interstate Compact

cc: Northwest Compact Committee

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