NRC FORM 7 (11-2012) 10 CFR 110

U. S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0027 EXPIRES: (11/30/2015)

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 Information Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollects.Resource@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 OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S)

(See Instructions on Pages 4 and 5)

PART A. FOR NRC USE ONLY	☑ PUBLIC OR ☐ NON-PUBLIC	DATE RECEIVED: JAN 23 2013 JC
LICENSE NUMBER: XW019	DOCKET NUMBER: 11005986	ADAMS ACCESSION NUMBER:

PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS

(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	1a. NAME OF APPLICANT'S CONTACT	1b. APPLICANT'S REFERENCE NUMBER
Perma-Fix Northwest Richland, Inc. (PFNW) 2025 Battelle Blvd. Richland, WA 99354 Contact: Curt Cannon	Paul M. Hickman	
	1c. PHONE NUMBER: (865) 342-7610	1d. FAX NUMBER: (865) 251-0355
	1e. E-MAIL ADDRESS: phickman@perma-fix.com	

2. TYPE OF ACTION REQUESTED *(Check One)*

☐ EXPORT (Parts B, C, E) ☐ IMPORT (Parts B, D, E) ☑ AMENDMENT/RENEWAL Current License Number: XW019 ☐ CONSENT REQUEST (Parts B, C) Current License Number:

3. CONTRACT NUMBER(S)	4. FIRST SHIPMENT DATE	5. LAST SHIPMENT DATE	6. PROPOSED EXPIRATION DATE
	April 1, 2013	March 31, 2017	March 31, 2017

PART C. TO BE COMPLETED FOR EXPORT 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	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S)	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S)
Perma-Fix Northwest Richland, Inc. (PFNW) 2025 Battelle Blvd. Richland, WA 99354 Contact: Curt Cannon		Comision Federal De Electricidad (CFE) Laguna Verde Nuclear Power Plant Veracruz, Mexico 91476 Contact: Jose Hernandez, Dragons de Veracruz Ph. 860-924-5126 Email: Dragonsdeveracruz@hotmail.com
7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED	8a. INTERMEDIATE USE(S)	9a. ULTIMATE END USE(S)
Return of process residuals		Storage or disposal by original generator

10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS; FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT	10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	10b. MAX ENRICHMENT OR WGT %	10c. MAX ISOTOPE WGT (KG)
Secondary ash from the thermal treatment of radioactive material. Exported material may include non-conforming material not capable of being processed by Perma-Fix. All returns will be in accordance with USDOT and IAEA regulations.	Not to exceed 4.5E5 Kg	Uranium enrichment not to exceed 10%	SNM not to exceed 350 grams

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

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APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER	DOCKET NUMBER	ADAMS ACCESSION NUMBER	☑ PUBLIC OR ☐ NON-PUBLIC
XW019	11005986		

PART D. TO BE COMPLETED FOR IMPORT 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 U. S. CONSIGNEE(S)

12a. NRC EXPORT LICENSE NUMBER(S) *(if applicable)*	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)

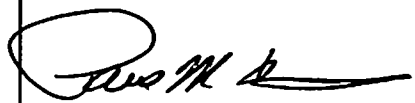
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c. MAX ISOTOPE WGT (KG)

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

PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS?	☑ YES ☐ NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED?	☐ YES ☑ NO

18. CERTIFICATION: **I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title10, 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	18b. SIGNATURE -- AUTHORIZED OFFICIAL	18c. DATE
Paul M. Hickman, International Director, Perma-Fix Environmental Services, Inc.		1-16-13

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U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER	DOCKET NUMBER	ADAMS ACCESSION NUMBER	☑ PUBLIC OR ☐ NON-PUBLIC
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ADDITIONAL INFORMATION *(Reference applicable block numbers from page 1 and/or page 2 for each entry)*

See attachments 1 and 2

JAN 23 2013
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Perma-Fix®
environmental services

January 16, 2013

Mr. Mark Shaffer
Acting Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

JAN 23 2013
JC

Subject: Amendment to Applications for
1) License IW031 to Import Radioactive Material
2) License XW019 to Export Radioactive Material

Dear Mr. Shaffer:

Perma-Fix Environmental Services, Inc. requests an amendment to the application for specific license IW031 regarding the import of potentially radioactively contaminated material from Mexico to our Perma-Fix Northwest (PFNW) facility located in Richland, Washington for processing under Washington Agreement State license. Perma-Fix also requests an amendment to the application for specific license XW019 regarding the export of resultant ash generated from this processing back to Mexico. This amendment's solitary change requests an option for recycling, reuse, or decontamination for free release of the containers used by Mexican companies to ship waste to DSSI. All other features, with exceptions of dates and contact information, of previously submitted applications for IW031 and XW019 remain unchanged.

These licenses currently request the importation of up to 500 Tons of radioactively contaminated material including metals, wood, paper, concrete, fabric, rubber, plastic, filters, activated carbon, resin, liquids and sludge. These categories may also include various amounts of aqueous and organic based (oily) fluids in varied mixtures. The specific material to be shipped in each shipment is not known as of the date of this application but will be limited to less than 10 % of the possession limits of the Perma-Fix PFNW license for possession and processing of radioactive materials so that the total amount of Mexican material at any one time will clearly be below the Washington State license limits.
The source of this material is CFE Laguna Verde Nuclear Power Plant located near Veracruz in Mexico. The purpose of the import license is to import potentially contaminated material for processing (volume reduction via thermal destruction) in dedicated burns to maintain proper segregation of the resultant waste. The purpose of the export license is to allow waste that is attributable to Mexican sources under this import license to be exported back to Mexico in appropriate customer-designated shipping containers.

Shipments of material will not be imported under this proposed US import license until Mexico has issued the appropriate authorizations to allow waste associated with an import under this applied for license to be returned back to Mexico.

The appropriate applications are attached.
If you need additional information, please call me at (865) 342-7610.

Sincerely,

Paul M. Hickman
Perma-Fix Environmental Services, Inc.

Attachments:
1) Import Application (Form 7)
2) Export Application (Form 7)
3) Addendum to Import Application
4) Addendum to Export Application

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ATTACHMENT 1

ADDENDUM TO PART 110 IMPORT APPLICATION

It is Perma-Fix's intention to import radioactive material for purposes of volume reduction through thermal destruction. This process will be campaigned to allow for segregation of the resultant ash, proper repackaging of the ash, and return of the ash in accordance with the associated NRC issued export license.

1) Name and Address of Applicant (10 CFR 110.32(a))

Perma-Fix Northwest Richland, Inc. (PFNW)
2025 Battelle Blvd.
Richland, WA 99354

Contact:
Curt Cannon
Ph. 509-375-5160
Email: ccannon@perma-fix.com

2) Name and Address of Supplier of the Material (10 CFR 110.32 (b))

Comision Federal De Electricidad (CFE)
Laguna Verde Nuclear Power Plant
Veracruz, Mexico 91476

Contact:
Jose Hernandez, Dragons de Veracruz
Ph. 860-924-5126
Email: Dragonsdeveracruz@hotmail.com

IW031
XW019

3) County of Origin (10 CFR 110.32(c))

Mexico

4) Ultimate Consignee (10 CFR 110.32 (d))

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Perma-Fix Northwest Richland, Inc. (PFNW)
2025 Battelle Blvd.
Richland, WA 99354

Contact:
Curt Cannon
Ph. 509-375-5160
Email: ccannon@perma-fix.com

5) Dates of Proposed First and Last Shipment (10 CFR 110.32(e))

Shipments expected between 2013 and 2017. First proposed shipment is April 2013. Shipments of material will not be imported under this proposed US import license until Mexico has issued an import license to allow material associated with the particular

import to be returned back to Mexico. There could be multiple import licenses issued by Mexico during the duration of this proposed US import license. Perma-Fix does not object to a license condition that limits each import under this license to materials that Mexico has issued an import authorization for the return of the associated radioactive component.

6) Description of the Material (10 CFR 110.32(f)(1 and 5))

The material to be imported consists of up to 500 Tons of radioactively contaminated material including semi-solids, solids, liquids, and other combustible and non-combustible materials containing primarily fission products radionuclides, H-13 and C-14. This may include metals, wood, paper, concrete, fabric, rubber, plastic, filters, activated carbon, resin, liquids and sludge. These categories may also include various amounts of aqueous and organic based (oily) fluids in varied mixtures. The imported waste was and is generated at the Laguna Verde Nuclear Power Plant including waste from operations, maintenance, modifications, laboratory analysis, laundry activities, etc. Only materials authorized by Perma-Fix Washington State licenses will be imported.

The chemical and physical form of the above isotopes may be in any form suitable for transport under US DOT regulations.
The radionuclides in the contamination imported over the duration of the proposed license will not exceed the following limits of Perma-Fix Northwest license No. WN-10393-1. Perma-Fix recognizes that it must at all times keep the total amount of material possessed at its site consistent with the possession limits in its license):

Radionuclides	Ci/TBq
Atomic #1-83 (other than DAW)	360/13.3
Co-60	40/1.48
Sr-90	4/0.148
Nb-94	7.5/0.227
Cd-113m	2/0.074
I-129	0.5/0.018
Eu-154	2/0.074
Pb-210	0.1/0.0037
SNM (350 gram U-235 equivalent limit)	
Source Material (5,000 Kg limit)	
#84-103 (except SNM and Source)	1/0.037
#1-83 (DAW)	50/1.85
Sources	0.1/0.0037

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The chemical and physical form of the above isotopes will be in forms suitable for transport under US DOT regulations and consistent with the limitations in No. WN-10393-1.

It is expected that the imports will involve numerous shipments during the term of the license. No one shipment will exceed the values found in 10 CFR Part 110, Appendix P, Table I, Category 2. In addition no one shipment will exceed 10 percent of the possession limits of Perma-Fix Northwest's license for possession and processing of radioactive materials. Perma-Fix Northwest recognizes that it must keep the total amount of material possessed at its site consistent with the possession limits in its license.

Shipments may include one or more packages of material. However, the quantities of radioactive material in any one package will not exceed the Table A_2 values of 49 CFR 173.435.

Imported material may or may not include mixed waste (mixed hazardous and radioactive waste constituents) as defined under the Resource Conservation and Recovery Act. Any non-conforming waste or difficult to process material has the potential for transfer to an alternate authorized processing facility managed by Perma-Fix. All secondary waste ash will be returned to Perma-Fix Northwest for export management as authorized by the applicable license. None of the ash waste resulting from the thermal treatment of these wastes will be disposed in the United States. Perma-Fix plans to minimize/eliminate the requirement to return the containers by which Mexican waste is shipped to PFNW for processing. Perma-Fix will recycle, reuse, or decontaminate for the free release the containers used by Mexican companies to ship waste to PFNW. Perma-Fix understands that any containers that are not recycled, reused or decontaminated for free release will not be eligible for disposal at EnergySolutions' Clive, Utah disposal facility.

7) Route of Shipments (10 CFR 110.32(f)(5))

Shipments will meet 49 CFR 171.12(e). The waste will enter the United States at Laredo, Texas and terminate at the PFNW facility in Richland, Washington. Shipments will be by exclusive use tractor-trailer trucks as LSA or as exempt quantity in drums, high integrity containers, B-25 boxes, bags or bulk transport. Shipments will be primarily by interstate highway

8) Ultimate Disposition of the Material (10 CFR 110.32(f)(5) and (6))

The imported material will be possessed and used in the United States in accordance with Perma-Fix Northwest's Washington State license No. Perma-Fix Northwest will only import radioactive material if its license is current or in timely renewal status.

Material received at PFNW will be subject to thermal destruction. In the process of thermal destruction ash will be generated. The generated ash from all processing and any nonconforming material not valid for alternate processing as referenced above will be returned to Laguna Verde, the generator, in Mexico. None of the waste resulting from the importation and thermal treatment of the Mexican wastes will be disposed in the United States.
Prior to importing any material under this license, CFR will provide written assurance from the appropriate Mexican authorities confirming CFE's authorization to accept the return of their material whether processed or unprocessed. This is also consistent with the Washington State license condition that requires in contracts the ability to return radioactive material processed or unprocessed to the supplier.

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Processing performed in accordance with Perma-Fix's radioactive materials licenses requires no additional authorization beyond the NRC import and export licenses approval.

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9) Justification of License (10 CFR 110.32(f)(7))

The dates for shipment will be based on the contract arrangements for individual shipments. It is consistent with international conventions entered into by the United States. This import license is directly linked to the corresponding export license.

ATTACHMENT 2

ADDENDUM TO EXPORT APPLICATION

1) Name and Address of Applicant (10 CFR 110.32(a))

Perma-Fix Northwest Richland, Inc. (PFNW)
2025 Battelle Blvd.
Richland, WA 99354

Contact:
Curt Cannon
Ph. 509-375-5160
Email: ccannon@perma-fix.com

2) Name and Address of Supplier of the Material (10 CFR 110.32(b))

Perma-Fix Northwest Richland, Inc. (PFNW)
2025 Battelle Blvd.
Richland, WA 99354

Contact:
Curt Cannon
Ph. 509-375-5160
Email: ccannon@perma-fix.com

3) County of Origin (10 CFR 110.32(c))

Mexico

4) Name and Address of Ultimate Consignee (10 CFR 110.32(d))

Comision Federal De Electricidad (CFE)
Laguna Verde Nuclear Power Plant
Veracruz, Mexico 91476

IW031
XW019

Contact: Jose Hernandez, Dragons de Veracruz
Ph. 860-924-5126
Email: Dragonsdeveracruz@hotmail.com

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5) Dates of Proposed First and Last Shipment (10 CFR 110.32(e))

Shipments expected between 2009 and 2013. The first shipment will not begin until the proposed import license which is associated with this application is issued and waste is generated during the processing of the imported material. In addition, exports are dependent on obtaining Mexico import permits for the associated US imported waste. Perma-Fix will not import any waste for processing until Mexico has issued an import license to allow waste associated with the particular import to be returned back to Mexico. There may be multiple import licenses issued by Mexico during the duration of this proposed US import license.

6) Description of the Material (10 CFR 110.32(f) (1) and (5))

The material subject to this application is the ash from the processing of material imported under the proposed import license which is associated with this application and any such imported material that was not processed. At this time it is not possible to estimate the quantities, volume, and curies of the materials that will need to be exported. It will be a fraction of the imported amount. Consequently, the material to be exported will not exceed the quantities which are specified in the associated import application.

The chemical and physical form of the isotopes to be returned may be in any form suitable for transport under US DOT regulations consistent with the limitations in Perma-Fix's license.

It is expected that the exports will involve numerous shipments during the term of the license. No one shipment will exceed the values found in 10 CFR Part 110, Appendix P, Table I, Category 2. In addition, no one shipment will exceed 10% of the possession limits of Perma-Fix Northwest's Washington State license.

Shipments may include one or more packages of material. However, the quantities of radioactive material in any one package will not exceed the Table A_2 values of 49 CFR 173.435.

In addition, the imported material will not exceed class A as defined in 10 CFR 61.55

7) Route of Shipments (10 CFR 110.32(f)(5))

The expected route of exports is by truck to the port of exit at Laredo, Texas. Truck shipments will be primarily by interstate highway.

8) Ultimate Disposition of the Material (10 CFR 110.32(f)(5))

The material exported under the proposed license will be returned to Mexico, the country of origin. As noted above in section 5, Perma-Fix will not import any waste for processing until Mexico has issued an import license to allow waste associated with the particular import to be returned back to Mexico. Any waste returned to Mexico will become the responsibility of Laguna Verde, the Mexican generator, to store and disposed of in accordance with the regulatory controls of Mexico.

9) Justification of License (10 CFR 110.32(f)(7))

This license is needed to address waste generated from processing potentially contaminated materials to be imported under the proposed import license associated with this application. It is consistent with international conventions entered into by the United States. This export license is directly linked to the proposed corresponding import license.

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