



International Isotopes Inc.

November 4, 2013

ATTN: Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Subject: Alternate Schedule to Complete Decommissioning - License SUB-1587
TAC No.: L36020

In a letter dated June 25, 2013, International Isotopes Inc. (INIS) requested an amendment to license SUB-1587 to remove Building 1359 from NRC license SUB-1587 and to limit the authorized uses of source material to possession and storage to support delaying the termination of license SUB-1587 until the source material and some potentially contaminated equipment worth salvaging could be transferred to the International Isotopes Fluorine Products (IIFP) NRC license SUB-1011.

A delay in termination of the license is requested until the construction of the SUB-1011 warehouse or other SUB-1011 facility that could receive and store source material and potentially contaminated equipment would be available. Under our current estimated construction schedule for the IIFP Hobbs, New Mexico, termination of the SUB-1587 license within the allotted 24 month time frame specified in §40.42(h) would not be achieved. We believe it is appropriate to delay the termination of the license so that the remaining depleted UF4 that we have under SUB-1527 can be transferred to the IIFP Hobbs, New Mexico SUB-1011 license and utilized in the operational readiness review testing of the fluorine extraction portion of the process. We therefore request an extension to complete decommissioning and the termination of license SUB-1587 to June 30, 2016. The following activities and estimated dates of completion are provided to support this request.

Please contact me at 208.524.5300 or via email at jjmiller@intisoid.com if you have any questions or comments regarding this request.

Sincerely,

John J. Miller, CHP
Radiation Safety Officer
JJM-2013-48

NIM 5501

Task	Estimated Date
1. Dispose ⁽¹⁾ of remaining depleted uranium oxide produced during R&D activities under SUB-1587 with byproduct waste generated under NRC license 11-27680-01	August, 2014
2. Dispose ⁽¹⁾ of (or decontaminate) contaminated/potentially contaminated equipment not identified for re-use under SUB-1011 with byproduct waste generated under NRC license 11-27680-01	August, 2014
3. Ground breaking IIFP Hobbs, New Mexico Site	January 2015
4. Commence construction on infrastructure, i.e. roads, storm water drains, evaporation ponds	March , 2015
5. Obtain ground water discharge permit from New Mexico Environmental Department	June, 2015
6. Warehousing facility constructed and ready for occupancy, IIFP Hobbs, New Mexico Site	March, 2016
7. Transfer depleted UF ₄ and contaminated/potentially contaminated equipment for reuse to IIFP Warehouse Hobbs, New Mexico Site.	June, 2016

Note 1: US Ecology Washington Inc. low level waste site, Richland WA, Generator Permit Number G2151.