

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

Before the Commission

In the Matter of)	
)	Docket No. 11006235
Edlow International Company)	
(As Agent for SCK CEN,)	
Studiecentrum Voor Kernenergie))	
)	
(Export of 93.20% Enriched Uranium))	
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EDLOW INTERNATIONAL COMPANY’S MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO INTERVENE ON HIGH ENRICHED URANIUM EXPORT LICENSE

Pursuant to 10 C.F.R. §§ 2.307, 2.323 and 110.109 Edlow International Company as agent for SCK CEN, Studiecentrum Voor Kernenergie (“Edlow”), hereby requests an extension of time, until October 4, 2016, in which to file its response to “Petition of Alan J. Kuperman for Leave to Intervene and Request a Hearing” (“Petition”), filed on August 4, 2016 (Docket No. 11006235). In support of this request, Edlow states as follows:

1. On May 18, 2016, Edlow applied for an export license of 134.208 kilograms (kg) of uranium-235 for use in the fuel reload of the BR-2 Research Reactor. The uranium-235 would in the form of fuel elements with a neutron absorber and would be manufactured by BWX Technologies in Lynchburg, Virginia. Edlow requested that the fuel be shipped in up to 5 kg per shipment over a period of ten years.

2. The BR-2 is a materials testing and research reactor, located in Mol, Belgium which has been in operation since 1961. The BR-2 is a water-moderated pool reactor

utilizing highly enriched uranium, which is used for a range of uses including materials research, nuclear fuel research, production of radioisotopes and production of doped silicon. Currently, the BR-2 is responsible for 20-25% of the annual production of radioisotopes world-wide.

3. Under 10 CFR § 110.41 (a)(2), the Executive Branch is required to review Edlow's application as the export request is more than one effective kilogram of high-enriched uranium. Based on a telephonic communication with the NRC Office of the Secretary on August 30, 2016, Edlow understands that the Executive Branch has not yet provided its views on this proposed export.
4. The Petition, among other matters, challenges the 10 year duration of Edlow's export request, the volume of the 5 kg per shipment export request and the compliance with Section 903 of the Comprehensive National Policy Act, Pub. L. No. 102-486, 106 Stat. 2944 (October 24, 1992).
5. Edlow has engaged in previous discussions with the Petitioner to determine if there is a manner to address the concerns raised in the Petition without the need for "a full and open public hearing" as requested in the Petition (see Petition, p.2).
6. Edlow does not wish to expend unnecessary legal expenses to provide a full response to the Petition if an alternative form of resolution may be obtained.
7. Given the critical role of the Executive Branch under 10 CFR § 110.41(a)(2), as well as its direct involvement in the intergovernmental negotiations and delivery of the highly enriched uranium which is the subject of this export request, the views of the

Executive Branch play an integral role in how Edlow will respond to the issues raised by the Petitioner.

8. Edlow is working with interested parties to identify a strategy to address the issues raised by the Petitioner without requiring the need for a hearing.

WHEREFORE, Edlow hereby requests a one-month extension, until October 4, 2016, for the filing of its response to the Petition.

Respectfully submitted,

/Signed electronically by Jeffrey S. Merrifield/

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