

## Northwest Interstate Compact

On Low-Level Radioactive Waste Management

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P.O. Box 47827, Olympia, Washington 98504-7827. (360) 236-3232. Kristen Schwab, Executive Director

January 26, 2017

Peter J. Habighorst, Chief  
Export Controls and Nonproliferation Branch  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Habighorst

The Northwest Interstate Compact received your letter to Mr. De LaBarre dated January 19, 2017, regarding a request by Perma-Fix Northwest, Inc. to amend import license IW022 and export license XW012. The Northwest Interstate Compact reviewed the request and has the following comments:

1. Any resulting secondary waste, clearly identifiable to the Canadian generator, and any shipping containers that are not recycled/reused, are not eligible for disposal at the Clive, UT or Richland, WA commercial disposal facilities, and shall be shipped back to the Canadian generator.
2. In the import and export application, Block 15 and Block 10 respectively, it is not clear what "Waste returned to Canada under this export license can exceed Table A2 values of 49 CFR 173.435 if the radioactivity is within the State of Washington issued Radioactive Materials license and meets all Department of Transportation requirements for transporting the waste" means. Does this mean the processed waste can be packaged in a Type B container when it is shipped back to the Canadian generator?

If you have questions, please do not hesitate to contact me at (360) 236-3232.

Sincerely,



Kristen Schwab, Executive Director  
Northwest Interstate Compact

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