

From: [Schwab, Kristen \(DOH\)](#)
To: [Jones, Andrea](#)
Subject: [External_Sender] RE: RE: RE: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05
Date: Thursday, February 02, 2017 8:01:17 PM

Thank you Andrea,

The submitted responses satisfy the Compact's concerns.

Kristen

Kristen Schwab, M.S.
Executive Director
Northwest Interstate Compact
Office of Radiation Protection
Washington Department of Health

Email: kristen.schwab@doh.wa.gov

Phone: Office 360-236-3232

Cell 360-280-9984

Web: <http://www.ecy.wa.gov/nwic/index.asp>

From: Jones, Andrea [mailto:Andrea.Jones2@nrc.gov]
Sent: Thursday, February 2, 2017 2:59 PM
To: Schwab, Kristen (DOH) <Kristen.Schwab@DOH.WA.GOV>
Cc: Freeman, Stanley <Stanley.Freeman@nrc.gov>
Subject: FW: RE: RE: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05

Hello Kristen,

Upon receipt of your incoming email below to Stanley Freeman on January 26, 2017, we circulated your questions (highlighted in blue text) to Perma-Fix. Please see in red text, Perma-Fix's response. I believe Perma-Fix's responses satisfies your two questions.

If you have any additional questions, please don't hesitate to contact me.

Thanks,
Andrea

From: Tammy Monday [mailto:tmonday@perma-fix.com]
Sent: Wednesday, February 01, 2017 4:59 PM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Cc: 'Autumn Bogus' <abogus@perma-fix.com>; 'Curt Cannon' <ccannon@perma-fix.com>; 'Richard Grondin' <rgrondin@perma-fix.com>

Subject: [External_Sender] RE: RE: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05

Andrea,

The following is Perma-Fix's response to the comments made by the Northwest Interstate Compact. Please let me know if you need a formal response on Perma-Fix letterhead. Thanks.

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, W A commercial disposal facilities, and shall be shipped back to the Canadian generator. **Perma-Fix response: We concur.**
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? **Perma-fix response: Perma-Fix will follow DOT rules and regulations while shipping Radioactive material to and from the Richland, Washington facility. The Radioactive materials license at the Washington facility will be adhered to for receiving, processing and storing of the radioactive material once it arrives. The License issued by Washington State is independent of the DOT regulations and regulates the waste once it arrives at the facility. Although the waste/material may exceed the A2 values mentioned as part of the DOT regulations it will most certainly be shipped in accordance with the applicable DOT rules and regulations.**

From: Schwab, Kristen (DOH) [<mailto:Kristen.Schwab@DOH.WA.GOV>]

Sent: Thursday, January 26, 2017 8:09 PM

To: Freeman, Stanley <Stanley.Freeman@nrc.gov>

Cc: Fordham, Earl W (DOH) <Earl.Fordham@DOH.WA.GOV>

Subject: [External_Sender] RE: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05

Stanley,

Please see the attached comments from the Northwest Interstate Compact. The hard copy is in the mail.

If you have any questions, please do not hesitate to contact me.

Thank you,

Kristen

Kristen Schwab, M.S.
Executive Director
Northwest Interstate Compact
Office of Radiation Protection
Washington Department of Health

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From: Fordham, Earl W (DOH)
Sent: Tuesday, January 24, 2017 8:30 AM
To: Schwab, Kristen (DOH) <Kristen.Schwab@DOH.WA.GOV>; Elsen, Mike (DOH) <Mike.Elsen@DOH.WA.GOV>
Subject: FW: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05

For your review and comment.

From: Freeman, Stanley [<mailto:Stanley.Freeman@nrc.gov>]
Sent: Tuesday, January 24, 2017 4:01 AM
To: 'DeLaBarreR@state.gov' <DeLaBarreR@state.gov>
Cc: Lane, Hilary <Hilary.Lane@nrc.gov>; Aguilar, Santiago <Santiago.Aguilar@nrc.gov>; 'Steven.Clagett@bis.doc.gov' <Steven.Clagett@bis.doc.gov>; TOIGO, OLIVER J (OLIVER.J.TOIGO@cbp.dhs.gov) <OLIVER.J.TOIGO@cbp.dhs.gov>; Reinholz, David (CNSC/CCSN) <david.reinholz@canada.ca>; Rodriguez-Luccioni, Hector <Hector.Rodriguez-Luccioni@nrc.gov>; Goodman, Jac <Jac.Goodman@Nuclear.Energy.Gov>; 'Richard.Goorevich@nnsa.doe.gov' <Richard.Goorevich@nnsa.doe.gov>; 'pete.dessaules@hq.doe.gov' <pete.dessaules@hq.doe.gov>; 'Jessica.Norles@nnsa.doe.gov' <Jessica.Norles@nnsa.doe.gov>; Fordham, Earl W (DOH) <Earl.Fordham@DOH.WA.GOV>; Bukharin, Oleg <Oleg.Bukharin@nrc.gov>; Sauls, Ernest E (Rett) CIV DTRA J10 (US) (ernest.e.sauls.civ@mail.mil) <ernest.e.sauls.civ@mail.mil>; 'randall.r.bennett@cbp.dhs.gov' <randall.r.bennett@cbp.dhs.gov>; Wong, Melanie <Melanie.Wong@nrc.gov>; Tafazzoli, Sheiba <Sheiba.Tafazzoli@nrc.gov>; Fordham, Earl W (DOH) <Earl.Fordham@DOH.WA.GOV>; Debra.Shults@tn.gov; standerson@utah.gov; lwalters@secompact.org; Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: Letter to Executive Branch re: Export and Import License Applications XW012/05 and IW022/05

Good morning,

Please find attached, a copy of the letter to the Executive Branch, along with proposed export and import license applications XW012/05 and IW022/05.

NRC Staff, please charge your time for this case to TM0008.

Regards,

Stanley Z. Freeman II

Licensing Assistant

Export Controls and Nonproliferation Branch

Office of International Programs

301-287-9064