

From: [Brian Paddock](#)
To: [Vietti-Cook, Annette](#); [Jones, Andrea](#); [Docket, Hearing](#)
Subject: [External_Sender] UniTech Services Group - Request for an Export License (Docket 11006249) and Request to Amend an Import License (Docket 11006248) Re: Dockets NRC-2017-0055 and NRC-2017-0054
Date: Friday, March 17, 2017 2:18:03 PM

TO: Annette L. Vietti Cook

Secretary of the Commission

U.S. Nuclear Regulatory Commission

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[regulations.gov](http://www.regulations.gov) comments www.Regulations.gov

From:

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Date: March 17, 2017

RE: Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249

Import & Export of 10,000 metric tonnes of radioactive waste from Canada by UniTech

Import <https://www.regulations.gov/docket?D=NRC-2017-0055>

Export <https://www.regulations.gov/docket?D=NRC-2017-0054>

I am an attorney licensed to practice in Tennessee and before the Federal District Courts in Tennessee, the U.S. Court of Appeals for the 6th. Circuit, and the Supreme Court of the United States. I am assisting organizations and individuals in Tennessee (including persons living in and near Oak Ridge Tennessee) concerning the import and export of radioactive waste as noticed in the above cited dockets.

I request an extension on the comment period and on the deadline to request a hearing and to intervene.

We request 90 days AFTER additional information is provided on which to base further analysis and decisions.

The available documents in these dockets do not completely or adequately explain what the waste is, where it is from, where it will go and what will happen with it, where it will end up or to what destinations it will be released.

How much in terms of volume, isotope specific radioactivity and physical form will be processed and how much of the above will result in unrestricted or restricted or conditional release and to what destinations, waste sites and recycling or reuse streams?

What processes are intended for which wastes at which UniTech processors (specific locations and states and license information) and at any and all partner or affiliated processors including but not limited to the former Babcock Services (which we understand is now owned by UniTech) and Toxco, in all the states in which UniTech has facilities and partners.

The importation including transport, processing, handling and release from radioactive regulatory control of some of 10,000 metric tons of radioactive waste to the U.S. and specifically to Oak Ridge Tennessee and transport of some back to Canada, on the face, appears to be unnecessary transport and dispersal of radioactive wastes and materials. I am assisting members of the affected and potentially affected public in Tennessee and we request the opportunity to review and comment, and potentially to intervene on this multi-year license application.

I am assisting individuals and organizations which will potentially be affected by the transport, processing, handling, release and incorporation of exposure to the radioactive waste/material/radioactivity in consumer goods, structures, and infrastructure and by the release from solid and/or hazardous waste facilities.

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