

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

In the Matter of:)	Case No. NRC-2017-0054
)	Docket Nos. 11006248 and
UniTech Service Group, Inc.)	11006249
)	License No. XW023
)	May 5, 2017
)	

**PETITIONER' APPENDIX OF MEMBERSHIP DECLARATIONS
IN SUPPORT OF PETITION FOR LEAVE TO INTERVENE
AGAINST SPECIFIC EXPORT LICENSE ISSUANCE
TO UNITECH SERVICE GROUP, INC. AND
REQUEST FOR ADJUDICATORY HEARING**

This appendix contains individual declarations signed by members of the Petitioners, Nuclear Information and Resource Service, Beyond Nuclear, the Nuclear Energy Information Service, Tennessee Environmental Council and Citizens for Alternatives to Chemical Contamination.

DECLARATION OF PAMELA HUGHES

I, Pamela Hughes, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 935 Creek Road Extension, Lewiston, NY 14092. I live approximately one mile from the Niagara River and less than two miles from the Lewiston-Queenston Bridge at the U.S.-Canada border. The I-190 Niagara Thruway precedes and connects to the Lewiston-Queenston Bridge and becomes the 405 Highway in Ontario, Canada.

3) For some 8 years, I have frequently taken my dogs for hikes along the Niagara River gorge on the American side, beginning at the back end of Art Park and along the gorge up to and just under the Lewiston-Queenston Bridge. This is at least a weekly and often, daily activity through all seasons of the year. I enjoy the natural environment and scenery along three different hiking paths, at three different levels of proximity to the Niagara River.

4) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sorting, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that there could in the future be additional unlimited or unrestricted such imports without future notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I further understand that an export license is being requested by UniTech so that materials that would require transfer to a land disposal facility subject to 10 CFR Part 61 can be returned to Canada.

5) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. UniTech has listed the international border crossings over the Lewiston-Queenston and Peace Bridges as two likely crossings for some of the shipments into the United States.

6) I am concerned that spills of this undetailed radioactive waste into the water courses near my home could contaminate area waters. Traffic backups on the approaches to the bridges in the Niagara and Buffalo regions, and the bridges themselves, routinely occur, especially during the tourist season. Sabotage or a terrorist attack on a shipment could threaten, in part or damage my home, my recreational opportunities and even the public water supply on which I routinely rely.

7) I am concerned about the potential of being exposed to "routine" radiation emissions from the transport of these radioactive waste materials, since there is so little public information

which describes them. UniTech has stated that some two dozen radioisotopes will be present in the waste, including Cesium -137 and Plutonium -238, -239 and -240. I am greatly concerned that I could be close enough to I-90, or driving on I-90, to be inadvertently exposed to potentially significant penetrating radiation from a slowed or stopped truck carrying the waste. The chance of being exposed to radiation emanating from radioactive waste material in truck beds without protective shielding or to residual contamination on the outside of shipping containers is of personal concern. Particularly if the shipments contain any liquid waste, a leak released during transport can travel through soil, water and air quickly.

8) I understand that the purpose of UniTech's export license request is to establish official NRC permission for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. It appears that the same border crossings used for import are also intended by UniTech to be the points for export, and that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

9) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that I might inadvertently purchase one or more items containing radioactively-contaminated metals from UniTech's imported wastes.

10) For the above reasons, UniTech's proposed shipments into and out of the United States of the radioactive waste materials poses unacceptable risks to the environment and public health and to my personal health and safety. I hereby designate Nuclear Information and Resource Service, a nonprofit anti-nuclear organization in Takoma Park, Maryland of which I am a member, to represent my interests in petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that NIRS be accorded standing to proceed on my behalf. My interests will not be adequately represented unless NIRS is allowed to participate as a full party in this proceeding on my behalf.

11) Further, Declarant saith naught.

5/5/17

Date



Pamela Hughes

DECLARATION OF LYNDA SCHNEEKLOTH

I, Lynda H. Schneekloth, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 601 W. Ferry St., Buffalo, NY 14222. Where I live, there are at least two bridge possibilities to cross from Canada into the United States through Regional Niagara, Ontario. One is the Lewiston Queenston Bridge which would bring people down to I-190 and across Grand Island. The other is the Peace Bridge that spans the confluence of Lake Erie and the Niagara River. The Peace Bridge and I-190 are within 1.5 miles from my home. The water that I drink (as well as other residents of Buffalo and downstream residents of other U.S. and Canadian communities) comes from Lake Erie. The water intake structure is located two miles southwest of the Peace Bridge, just before the Lake enters the Niagara River.

3) Like many others in this region, I frequently enjoy the parks adjacent to the Niagara River. More than once per week, I walk my dog along the upstream and downstream shores of the River. During the summer months, I kayak on the River on Grand Island, the Lake Erie shoreline along the Outer Harbor, and also in the Buffalo River, which empties into the Niagara River. In the past I've taken, and intend in the future to take, my grandchildren fishing at Broderick Park on Unity Island (formerly Squaw Island) just north of the Peace Bridge. I frequently take walks along the Bird Island pier that sits between the Niagara River and Black Rock Canal. I also patronize commercial establishments and the dog park along the Niagara River and at Lasalle Park. This is all in my neighborhood.

4) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sortation, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that there could in the future be additional unlimited or unrestricted such imports without future notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I further understand that an export license is being requested by UniTech so that materials that would require transfer to a land disposal facility subject to 10 CFR Part 61 can be returned to Canada.

5) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. UniTech has listed the international border crossings over the Lewiston Queenston and Peace Bridges as two likely crossings for some of the shipments into the United States.

6) I am concerned that spills of this undetailed radioactive waste into the watercourses near my home could contaminate area waters. Traffic backups on the approaches to the bridges and the bridges themselves routinely occur, especially during the tourist season. Sabotage or a terrorist attack on a shipment could threaten, impair or damage my home, my recreational opportunities and even the public water supply on which I routinely rely.

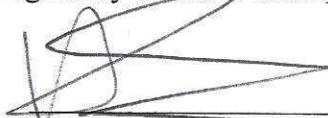
7) I am concerned about the potential of being exposed to "routine" radiation emissions from the transport of these radioactive waste materials, since there is so little public information which describes them. UniTech has stated that some two dozen radioisotopes will be present in the waste, including Cesium-137 and Plutonium-238, -239 and -240. I am greatly concerned that I could be close enough to I-90, or driving on I-90, to be inadvertently exposed to potentially significant penetrating radiation from a slowed or stopped truck carrying the waste. The chance of being exposed to radiation emanating from radioactive waste material in truck beds without protective shielding or to residual contamination on the outside of shipping containers is of personal concern. Particularly if the shipments contain any liquid waste, a leak released during transport can travel through soil, water and air quickly.

8) I understand that the purpose of UniTech's export license request is to establish official NRC permission for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. It appears that the same border crossings used for import are also intended by UniTech to be the points for export, and that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

9) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that I might inadvertently purchase one or more items containing radioactively-contaminated metals from UniTech's imported wastes.

10) For the above reasons, UniTech's proposed shipments into and out of the United States of the radioactive waste materials poses unacceptable risks to the environment and public health and to my personal health and safety. I hereby designate Nuclear Information and Resource Service, a nonprofit anti-nuclear organization in Takoma Park, Maryland of which I am a member, to represent my interests in petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that NIRS be accorded standing to proceed on my behalf. My interests will not be adequately represented unless NIRS is allowed to participate as a full party in this proceeding on my behalf. Further, Declarant saith naught.

May 3, 2017
Date


Lynda H. Schneekloth

DECLARATION OF NORA NATOF

I, Nora Natof, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, and am not under disability, and make the following statements voluntarily.

2) My residence address is 550 East Hoofecker Rd., Pottstown, PA 19465. I live approximately 8 miles from a facility owned by Unitech Services Group, Inc. located in Royersford, PA.

3) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sorting, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, without disclosure of what materials will be exported back to Canada, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that the public is not being properly informed of what wastes will be exported under UniTech's specific license request and that there could in the future be additional unlimited or unrestricted such imports and exports, all without notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I understand that UniTech seeks a specific export license for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. From UniTech's plans, it appears that the same border crossings used for import are also intended by UniTech to be the points for export, and also that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

4) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada.

5) I travel to Royersford on at least a monthly basis to conduct business and visit medical providers. I frequently use roads and highways in the larger region.

6) I am not aware of any dedicated transportation system that will be used for the delivery or the removal of the radioactive waste materials, and I assume that the principal mode will be by truck. An accident involving these radioactive waste shipments in the vicinity of my home, the major highways on which I travel, or near the places where I recreate would not only contaminate area land and water but could pose a threat to public health and the environment.

7) I believe transporting these radioactive materials poses a clear and present danger to me, to public health and the environment, along these routes. The thought of being stuck in traffic next to one of these transports causes me great concern for my health and safety. Multiple transports means exposure could have a cumulative effect along these routes. Considering the

risk they pose for potential attack or sabotage, it's too much to risk. There has been no public outreach, nor attempts to contact the public (to my knowledge), nor public health or environmental impact studies done. If there is an accident, the potential for contamination is great, for the public, the environment and emergency response personnel. Therefore, I adamantly oppose these transports, and I do not believe that the Canadian government, the U.S. government, or private industry has the right to make the decision to risk our public health or the environment.

8) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that my family or I might inadvertently purchase one or more items containing radioactively-contaminated metals made from UniTech's imported wastes.

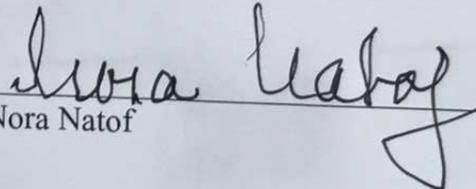
9) I hereby designate Nuclear Information and Resource Service ("NIRS"), a nonprofit grassroots safe energy and antinuclear group located in Takoma Park, MD, of which I am a member to represent my interests in a petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that NIRS be accorded standing to proceed on my behalf. My interests will not be adequately represented unless NIRS is allowed to participate as a full party in this proceeding on my behalf.

10) Further, Declarant saith naught.

Date

5/4/17

Nora Natof



DECLARATION OF MICHAEL KEEGAN

I, Michael Keegan, hereby make the following statements under the penalty of perjury:

MK

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 811 Harrison, Monroe, Michigan.

3) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sortation, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that there could in the future be additional unlimited or unrestricted such imports without future notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I further understand that an export license is being requested by UniTech so that materials that would require transfer to a land disposal facility subject to 10 CFR Part 61 can be returned to Canada.

4) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. UniTech has listed the international border crossing over the Blue Water Bridge at Port Huron, Michigan as one of five likely crossings into the United States.

5) Interstate 75 is a logical southward connection for shipments of UniTech's radioactive wastes once they cross the border at Port Huron. That means that the radioactive waste will pass by my home via I-75. I live about two miles from I-75. If there were a spill at or near Monroe, Michigan on I-75, the extensive, connected surface waters, consisting of rivers, streams and estuaries of nearby Lake Erie which at some locations are on either side of the highway could become pathways for waterborne radioactive waste contamination throughout a large area. I regularly use I-75 to travel south to Toledo and north central Ohio and to drive north to Detroit and points to the north and west. I-75 is more or less constantly being maintained and repaved and traffic backups are a daily occurrence. Sabotage or a terrorist attack on a shipment could threaten, impair or damage my home, my recreational opportunities and even the public water supply on which I routinely rely.

6) I am concerned about the potential of being exposed to "routine" radiation emissions from the transport of these radioactive waste materials, since there is so little public information which describes them. UniTech has stated that some two dozen radioisotopes will be present in the waste, including Cesium-137 and Plutonium-238, -239 and -240. I am greatly concerned that with no notice or warning, I could be close enough to I-75, or driving on I-75, to be inadvertently

MK

exposed to potentially significant penetrating radiation from a slowed or stopped truck carrying the waste. The chance of being exposed to radiation emanating from radioactive waste material in truck beds without protective shielding or to residual contamination on the outside of shipping containers is of personal concern. Particularly if the shipments contain any liquid waste, a leak released during transport can travel through soil, water and air quickly.

7) I understand that the purpose of UniTech's export license request is to establish official NRC permission for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. It appears that the same border crossings used for import are also intended by UniTech to be the points for export, and that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

8) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that I might inadvertently purchase one or more items containing radioactively-contaminated metals from UniTech's imported wastes.

9) For the above reasons, UniTech's proposed shipments into and out of the United States of the radioactive waste materials poses unacceptable risks to the environment and public health and to my personal health and safety. I hereby designate Beyond Nuclear, a nonprofit anti-nuclear organization in Takoma Park, Maryland of which I am a member, to represent my interests in petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that Beyond Nuclear be accorded standing to proceed on my behalf. My interests will not be adequately represented unless Beyond Nuclear is allowed to participate as a full party in this proceeding on my behalf.

10) Further, Declarant saith naught.

May 4, 2017
Date

Michael Keegan
Michael Keegan

DECLARATION OF Daniel Stephenson

I, Daniel Stephenson hereby make the following statements under the penalty of perjury:

- 1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.
- 2) My residence address is 145 Cedar Grove Church Rd, Kingston TN 37763.
- 3) I understand that the Nuclear Regulatory Commission has been asked to permit 10,000 metric tons of radioactive waste to be imported from Canada, transported around the United States and arrive in Oak Ridge Tennessee. (Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249.) The radioactive waste is to be “processed” at UniTech in the East Tennessee Technology Park in the City of Oak Ridge, Tennessee [<http://www.ettpreuse.com/>] and at TOXCO 109 Flint Road Oak Ridge TN 37830.
- 4) I and my family live within 10 miles downstream of the East Tennessee Technology Park. My mother, father and I drive through it daily to work in Oak Ridge. I am concerned that the transport, handling, processing and release of this radioactive waste creates risks to me and others and to the safety of our water and air. I am concerned that the transport and handling of this radioactive waste creates risks to me and others and to the safety of our water and air.
- 5) I understand that some of the waste is to be returned (exported) to Canada. This creates more risks of exposure to radiation during transport and increases the opportunity for accidents which would release the waste and radioactive materials to the environment.
- 6) It appears that the 10,000 metric tons of radioactive waste will require a very large number of shipments via either truck or rail cars or both. Some truck transportation will be required even if rail transportation is also used. Any spill of solid material will create great risks, a costly clean up and damage Oak Ridge’s efforts to shed its image as a city threaten by radiation as a legacy of nuclear weapons development and production. If there is any liquid waste a leak released during transport or at the processing site can travel through soil, water and air quickly.
- 7) In Oak Ridge millions of dollars have been spent to clean up radioactive waste dumped helter-skelter during the time nuclear weapons were being devised. We need to be sure that there will be no new contribution to our radioactive waste woes, which are ongoing as the Y-12 clean up continues. There is no agreement between the Department of Energy, the Environmental Protection Agency and the Tennessee Department of Environment and Conservation on an expansion or additional location for a radioactive

waste dump site to accommodate the remaining waste that will be produced as the Y-12 cleanup proceeds.

- 8) Because Tennessee allows radioactive materials into landfills which originally are designed and permitted only for household garbage I am concerned that some of the radioactive waste will be transported to and remain in Anderson County at the Waste Management Chestnut Ridge landfill which has permission to accept radioactive waste. More radioactive waste may mix with other nasty wastes with unknown consequences. The leachate from this landfill may carry radioactive particles and I am concerned that this possible release to the environment has not been analyzed and prevented.
I am concerned that our limited landfill space at Anderson county Chestnut Ridge landfill will be exhausted sooner if we bring in this waste from Canada and US nuclear industry waste and potential future wastes from around the world.
- 9) I am concerned about the release of radioactive metals and other materials into landfills (as previously stated) and into tools, equipment and other supposedly cleaned items that may be reused (so-called 'beneficial reuse') and into recycling streams (metal, aluminum, plastic, asphalt, and others) that could be used to make items we contact daily, building supplies, roads and other destinations. I am concerned being about additional radiation about the synergistic effects with other pollutants and stressors in my environment.
- 10) I have asked the Tennessee Environmental Council and the Nuclear Information and Resource Service to intervene in the proceeding before the Nuclear Regulatory Commission so that my concerns and opposition to allowing the importation of radioactive waste may be heard and that the NRC refuse to allow this large amount of radioactive waste to be brought to Oak Ridge Tennessee.
- 11) There has been no Environmental Impact Statement prepared which should lay out the proposed activity, both transport and processing and explain the risk to our human environment. It seems to me that the transport proposal poses unacceptable risks to the environment and public health and to my personal health and safety, and that of my family. Moreover, I am concerned that there could be a stigma or actual decline in the value of the real estate I own if shipments pass through the area in which I live.
- 12) I hereby designate the Tennessee Environmental Council (TEC) [<http://tectn.org/>] and the Nuclear Information and Resource Service (NIRS) [<https://www.nirs.org/>] as my representatives in proceeding before the Nuclear Regulatory Commission. My interests will not be adequately represented unless TEC and NIRS are allowed to participate as a full party in this proceeding on my behalf.

Date: May 4, 2017

Daniel Stephenson



DECLARATION OF David Collins Wasilko

I, David Collins Wasilko hereby make the following statements under the penalty of perjury:

- 1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.
- 2) My residence address is 2433 E 5th Ave, Knoxville, TN 37917. I also reside at 981 Hamilton Lane, Kingston, TN 37763 during the summer.
- 3) I understand that the Nuclear Regulatory Commission has been asked to permit 10,000 metric tons of radioactive waste to be imported from Canada, transported around the United States and arrive in Oak Ridge Tennessee. (Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249.) The radioactive waste is to be “processed” at UniTech in the East Tennessee Technology Park in the City of Oak Ridge, Tennessee [<http://www.ettpreuse.com/>] and at TOXCO 109 Flint Road Oak Ridge TN 37830.
- 4) I am working in Oak Ridge this summer as an engineering intern. I farm and garden at my parent’s home at 981 Hamilton Lane, Kingston TN 37763, which is 9 miles by car from ETTP. I grew up in Oak Ridge and still enjoy running on the greenways and kayaking the rivers and lakes near ETTP. My grandparents live in Kingston, 10 miles away, and my parents live in Oak Ridge, 7 miles away. I am concerned that the transport, handling, processing and release of this radioactive waste creates risks to me and others and to the safety of our water and air. I am concerned that the transport and handling of this radioactive waste creates risks to me and others and to the safety of our water and air.
- 5) I understand that some of the waste is to be returned (exported) to Canada. This creates more risks of exposure to radiation during transport and increases the opportunity for accidents which would release the waste and radioactive materials to the environment.
- 6) It appears that the 10,000 metric tons of radioactive waste will require a very large number of shipments via either truck or rail cars or both. Some truck transportation will be required even if rail transportation is also used. Any spill of solid material will create great risks, a costly clean up and damage Oak Ridge’s efforts to shed its image as a city threaten by radiation as a legacy of nuclear weapons development and production. If there is any liquid waste a leak released during transport or at the processing site can travel through soil, water and air quickly.

- 7) In Oak Ridge millions of dollars have been spent to clean up radioactive waste dumped helter-skelter during the time nuclear weapons were being devised. We need to be sure that there will be no new contribution to our radioactive waste woes, which are ongoing as the Y-12 clean up continues. There is no agreement between the Department of Energy, the Environmental Protection Agency and the Tennessee Department of Environment and Conservation on an expansion or additional location for a radioactive waste dump site to accommodate the remaining waste that will be produced as the Y-12 cleanup is proceed.
- 8) Because Tennessee allows radioactive materials into landfills which originally are designed and permitted only for household garbage I am concerned that some of the radioactive waste will be transported to and remain in Anderson County at the Waste Management Chestnut Ridge landfill which has permission to accept radioactive waste. More radioactive waste may mix with other nasty wastes with unknown consequences. The leachate from this landfill may carry radioactive particles and I am concerned that this possible release to the environment has not been analyzed and prevented.
I am concerned that our limited landfill space at Anderson county Chestnut Ridge landfill will be exhausted sooner if we bring in this waste from Canada and US nuclear industry waste and potential future wastes from around the world.
- 9) I am concerned about the release of radioactive metals and other materials into landfills (as previously stated) and into tools, equipment and other supposedly cleaned items that may be reused (so-called ‘beneficial reuse’) and into recycling streams (metal, aluminum, plastic, asphalt, and others) that could be used to make items we contact daily, building supplies, roads and other destinations. I am concerned being about additional radiation about the synergistic effects with other pollutants and stressors in my environment.
- 10) I have asked the Tennessee Environmental Council and the Nuclear Information and Resource Service to intervene in the proceeding before the Nuclear Regulatory Commission so that my concerns and opposition to allowing the importation of radioactive waste may be heard and that the NRC refuse to allow this large amount of radioactive waste to be brought to Oak Ridge Tennessee.
- 11) There has been no Environmental Impact Statement prepared which should lay out the proposed activity, both transport and processing and explain the risk to our human environment. It seems to me that the transport proposal poses unacceptable risks to the environment and public health and to my personal health and safety, and that of my family. Moreover, I am concerned that there could be a stigma or actual decline in the value of the real estate I own if shipments pass through the area in which I live.

- 12) I hereby designate the Tennessee Environmental Council (TEC) [<http://tectn.org/>] and the Nuclear Information and Resource Service (NIRS) [<https://www.nirs.org/>] as my representatives in proceeding before the Nuclear Regulatory Commission. My interests will not be adequately represented unless TEC and NIRS are allowed to participate as a full party in this proceeding on my behalf.

Date: May 5, 2017

A handwritten signature in black ink, appearing to read "David Wasilko". The signature is written in a cursive style with a horizontal line underneath it.

David Collins Wasilko

DECLARATION OF CONNIE BEAUVAIS

I, Connie Beauvais, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, and am not under disability, and make the following statements voluntarily. I am a member of Citizens for Alternatives to Chemical Contamination (CACC), which is a grassroots environmental education and advocacy organization in central Michigan which is dedicated to the principles of social and environmental justice, pollution prevention, citizen empowerment, and general environmental protection with a focus on the Great Lakes bioregion. CACC is dedicated to building and maintaining a network capable of providing citizens with information, education, and connections that lead to action to protect the environment.

2) My residence address is 13031 Center, Bath, MI 48808-8437.

3) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sorting, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, without disclosure of what materials will be exported back to Canada, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that the public is not being properly informed of what wastes will be exported under UniTech's specific license request and that there could in the future be additional unlimited or unrestricted such imports and exports, all without notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I understand that UniTech seeks a specific export license for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. From UniTech's plans, it appears that the same border crossings used for import are also intended by UniTech to be the points for export, and also that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

4) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. UniTech has listed the international border crossing over the Blue Water Bridge at Port Huron, Michigan as one of five likely crossings into the United States. Thus it is a given that at least some shipments of radioactive wastes will be routed through Michigan on Interstate 75 to Tennessee, and/or on Interstate 69 to Illinois.

5) I frequently visit the Bengal Wildlife Center, 6380 Drumheller Road, Bath, MI 48808, which is located within a mile of I-69 and is also within a mile of U.S. Highway 127 to attend meetings of the Michigan Environmental Council and also the Audubon Society. I frequently hike and morel mushroom hunt in Rose Lake State Wildlife Area, which lies along I-69 near Bath, and is mostly within 2 miles or less of the interstate. I also travel U.S. 127 in the area many

times during the summer, going back and forth to our family cottage near Lake Michigan.

6) An accident involving these radioactive waste shipments in the vicinity of my home, the major highways on which I travel, or near the places where I recreate would not only contaminate area land and water but could pose a threat to public health and the environment. Bath Township has many acres of surface water, including streams, lakes and marshes, which are interconnected. My use of the Rose Lake Wildlife Area, access to regional major highway transportation, and usage of the Bengal Wildlife Center for recreation and learning would likely be curtailed if there were a significant spill of the wastes as imported, or en route to export.

7) I believe transporting these dangerous and unstable materials poses a clear and present danger to me, my family, public health and the environment, along these routes. The thought of being stuck in traffic next to one of these transports causes me great concern for our health and safety. Multiple transports means exposure could have a cumulative effect along these routes. Considering the risk they pose for potential attack or sabotage, it's too much to risk. There has been no public outreach, nor attempts to contact the public (to my knowledge), nor public health or environmental impact studies done. If there is an accident, the potential for contamination is great, for the public, the environment and emergency response personnel. Therefore, I adamantly oppose these transports, and I do not believe that the Canadian government, the U.S. government, or private industry has the right to make the decision to risk our public health, the environment, or the Great Lakes Basin.

8) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that my family or I might inadvertently purchase one or more items containing radioactively-contaminated metals made from UniTech's imported wastes.

9) I hereby designate Citizens for Alternatives to Chemical Contamination ("CACC"), a nonprofit grassroots environmental betterment organization of which I am a member which is located at 8735 Maple Grove Road, Lake, MI 48632, to represent my interests in a petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that CACC be accorded standing to proceed on my behalf. My interests will not be adequately represented unless CACC is allowed to participate as a full party in this proceeding on my behalf.

10) Further, Declarant saith naught.

5-4-2017

Date

Connie Beauvais

Connie Beauvais

DECLARATION OF APRIL GERSTUNG

I, April Gerstung, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 2015 W. Southmoor Rd., Morris, IL.

3) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sorting, processing, and disposition, possibly bringing the material here to Morris to a UniTech facility, and also to UniTech facilities or affiliates in Pennsylvania and Tennessee. I understand this will be done without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, without disclosure of what materials will be exported back to Canada, and without according the public a hearing or public comment opportunity. Since the importation is taking place via a generic license, I am concerned that the public is inevitably not being properly informed of what wastes will be exported under UniTech's specific license request and that there could in the future be additional unlimited or unrestricted such imports and exports, all without notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I understand that UniTech seeks a specific export license for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. From UniTech's plans, it appears that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

4) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. I live about 3.5 miles from the UniTech facility in Morris, and I often travel on errands within Morris at much closer distances to that facility. I am concerned that if there are air or water emissions from the UniTech plant that I might be exposed to radiation releases. I am not aware of any dedicated transportation system that will be used for the delivery or the removal of the radioactive waste materials, and I assume that the principal mode will be by truck. An accident involving these radioactive waste shipments in the vicinity of my home, the area highways on which I travel, or near the places where I recreate would not only contaminate area land and water but could pose a threat to public health and the environment.

5) I believe transporting radioactive materials - especially those which are so poorly described in the UniTech application - poses a danger to me, my family, to public health in my community, and the environment. The thought of being stuck in traffic next to one of these transports causes me great concern for my health and safety. Multiple transports means exposure could have a cumulative effect along these routes. There has been no public outreach or attempts

to contact the public in and around Morris about these licenses (to my knowledge), nor public health or environmental impact studies done. If there is an accident, the potential for contamination is great, for the public, the environment and emergency response personnel. Therefore, I oppose these transports, and I do not believe that the Canadian government, the U.S. government, or private industry has the right to make the decision to risk our public health, the environment, or the Great Lakes Basin.

6) I also understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that my family or I might inadvertently purchase one or more items containing radioactively-contaminated metals made from UniTech's imported wastes.

7) I hereby designate Nuclear Energy Information Service ("NEIS"), a nonprofit grassroots environmental betterment organization of which I am a member which is located at 3411 W. Diversey #13, Chicago, IL 60647, to represent my interests in a petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that NEIS be accorded standing to proceed on my behalf. My interests will not be adequately represented unless NEIS is allowed to participate as a full party in this proceeding on my behalf.

9) Further, Declarant saith naught.

MAY 5, 2017
Date

April Gerstung
April Gerstung

DECLARATION OF ELIZABETH ZIMMER-LLOYD

I, Elizabeth Zimmer-Lloyd, hereby make the following statements under the penalty of perjury:

1) I am an adult citizen of the United States, am not under disability, and make the following statements voluntarily.

2) My residence address is 1631 Wells St., Port Huron, Michigan.

3) I understand that the Nuclear Regulatory Commission has conferred upon UniTech Service Group, Inc. a general import license which would allow an uncharacterized 10,000 tons of radioactive material/waste to be imported from Canada into the United States for sorting, processing, and disposition, possibly in Illinois, Pennsylvania and Tennessee, all without affording the public details about the radioactive materials to be shipped and their comparable dangerousness, without disclosure of what materials will be exported back to Canada, and without according the public a hearing or public comment opportunity. Since the import is via a generic license, I am concerned that the public is not being properly informed of what wastes will be exported under UniTech's specific license request and that there could in the future be additional unlimited or unrestricted such imports and exports, all without notice or details about the actual content of the waste shipments. The permit dockets are Dockets NRC-2017-0055 and NRC-2017-0054; Dockets #11006248, 11006249. I understand that UniTech seeks a specific export license for the return to Canada of wastes which are radioactive enough to require special storage equivalent to the disposition of low-level radioactive waste in the United States. From UniTech's plans, it appears that the same border crossings used for import are also intended by UniTech to be the points for export, and also that the material being returned may be in more concentrated form than the wastes which were transported by UniTech into this country.

4) The shipment of 10,000 tons means that perhaps 300 to 400 truckloads of radioactive waste material will travel on American highways from Canada. UniTech has listed the international border crossing over the Blue Water Bridge at Port Huron, Michigan as one of five likely crossings into the United States. I live 2.5 miles from the Blue Water Bridge (east of me), less than 1 mile from I-69 (north of me) that goes west from the Blue Water Bridge and about 2 miles from the I-69/I-94 interchange (west of me), so basically I am surrounded by proposed routes these transport may travel.

5) With the exception of crossing the Blue Water Bridge, I travel on or near these routes almost daily. I travel on I-69 to visit friends and travel to shop, and on I-94 and I-75 for the same reasons. I live less than 2 miles from the St. Clair River and 2.5 miles from Lake Huron. I have lived, worked and recreated along these routes and waterways, my entire life, raised 6 children here and now have 20 grand children, who also live here. I frequent down town Port Huron (on the St. Clair River, less than a mile from the route) to shop, recreate, attend civic and organizational meetings, at least 10 times a month, often at our St. Clair County Administration building, 200 Grand River, Port Huron (½ block from the river & less than a mile from the Blue

Water Bridge). I attend many events at the St. Clair County Community College, 311 Erie st, Port Huron and the McMorrان Place, 701 McMorrان Blvd. in Port Huron. (less than a mile from the routes). I swim, boat, fish (in the St. Clair river and Lake Huron). I walk, bike, and hike near these routes. I shop at the Farmers market on the banks of St. Clair river, less than a mile from the Blue Water bridge, often twice a week, and right next to it, the Maritime Center, 51 Water st. Port Huron, during the summer.

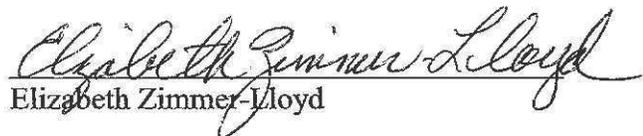
6) Given the information I've gained from experts familiar with radioactive wastes, I believe transporting these dangerous and unstable materials poses a clear and present danger to me, my family, public health and the environment, along these routes. The thought of being stuck in traffic next to one of these transports (particularly with my grand children in our car), causes me great concern for our health and safety. Multiple transports means exposure could have a cumulative effect along these routes. Considering the risk they pose for potential attack or sabotage, it's too much to risk. There has been no public outreach or attempts to contact the public (to my knowledge), nor public health or environmental impact studies done. If there is an accident, the potential for contamination is great, for the public, the environment and emergency response personnel. Therefore, I adamantly oppose these transports, and I do not believe that the Canadian government, the U.S. government, or private industry has the right to make the decision to risk our public health, the environment, or the Great Lakes Basin.

7) I understand that one of the proposed uses of metals recovered from the UniTech radioactive wastes is unrestricted recycling in U.S. and global metal markets and that the metals could find their way into industrial and consumer goods. As a person who from time to time purchases consumer goods with metallic content in them, such as automobiles, garden tools, hand tools, power tools, silverware, building supplies, and jewelry, I am concerned that my family or I might inadvertently purchase one or more items containing radioactively-contaminated metals made from UniTech's imported wastes.

8) I hereby designate Citizens for Alternatives to Chemical Contamination ("CACC"), a nonprofit grassroots environmental betterment organization of which I am a member which is located at 8735 Maple Grove Road, Lake, MI 48632, to represent my interests in a petition to intervene against the import and export licensing of the UniTech radioactive waste shipments. I request that CACC be accorded standing to proceed on my behalf. My interests will not be adequately represented unless CACC is allowed to participate as a full party in this proceeding on my behalf.

9) Further, Declarant saith naught.

05/09/2017
Date


Elizabeth Zimmer-Lloyd