

**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 12, 2017
)	

**NOTICE OF FILING OF DECLARATION
OF JESSICA AZULAY CHASNOFF**

Notice is hereby given of the filing of the Declaration of Jessica Azulay Chasnoff by Petitioners Nuclear Information and Resource Service, Beyond Nuclear, the Nuclear Energy Information Service, Tennessee Environmental Council and Citizens for Alternatives to Chemical Contamination. Ms. Chasnoff is identified in the pending Petition, but her declaration was erroneously omitted from being included in the appendix of declarations that was filed contemporaneously with the Petition.

Respectfully,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing “NOTICE OF FILING OF DECLARATION OF JESSICA AZULAY CHASNOFF” was served by me upon the parties to this proceeding via my deposit of the document in the NRC’s Electronic Information Exchange system this 12th day of May, 2017. I further certify that on this date, I served a paper copy via regular U.S. Mail, postage prepaid, upon Executive Secretary, U.S. Department of State, Washington, DC 20520 and via email to Patricia Lacina, Deputy Executive Secretary, Department of State.

/s/ Diane D’Arrigo
Diane D’Arrigo, NIRS

DECLARATION OF JESSICA AZULAY CHASNOFF

I, Jessica Azulay Chasnoff, 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, 203 Bassett Street, Syracuse, NY, is located about a mile from Interstate Highway 81. My office is just a few blocks from my home, and is about 1.2 miles from I-81. Syracuse is located about 100 miles south of the Thousand Islands border crossing from Canada, and I-81 is the only interstate highway which connects to that crossing, from whence the route proceeds southwest of the crossing and through Syracuse.
- 3) I spend much of my time within about a two-mile distance from I-81, working and engaged in recreation. My partner, Jason "Jocko" Randall, lives within a few hundred feet of I-81. We often spend time at his business, a recording studio, which is located nearby, also within a few hundred feet of I-81.
- 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 crossing near my home, over the Thousand Islands bridge and thence through Syracuse on I-81, as one of five likely crossings into the United States. Any transport-related terrorist attack or contamination of the lands and surface waters of Syracuse could threaten, impair or damage my home, my place of employment, 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-81, or driving on I-81, to be inadvertently exposed to potentially significant penetrating radiation from a slowed or stopped truck carrying the waste. I am of child-bearing age and 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 a 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.

5/5/17
Date


Jessica Azulay Chasnoff