

EXPORT LICENSE

NRC FORM 250
(10-07)

UNITED STATES OF AMERICA
Nuclear Regulatory Commission
Washington, D.C. 20555

NRC LICENSE NO.: PXB215b.00

Page 1 of 3

NRC DOCKET NO.: 11006262

LICENSE EXPIRES: October 31, 2018

Pursuant to the Atomic Energy Act of 1954, as amended, and the regulations issued by the Nuclear Regulatory Commission (NRC) pursuant thereto, and in reliance on statements and representations heretofore made by the applicant/licensee, this license is hereby issued authorizing the licensee to export the byproduct materials listed below, subject to the terms and conditions herein. This license is only valid if the licensee or 'Other Party(ies) to Export' maintain the requisite NRC or Agreement State domestic license(s).

<p align="center">LICENSEE</p> <p>ISOFLEX Radioactive, LLC 108 Teal Street St. Rose, LA 70087</p> <p>Attn: Kevin Schehr</p>	<p align="center">ULTIMATE CONSIGNEE(S) IN FOREIGN COUNTRY(IES)</p> <p align="center">See 'Country(ies) of Ultimate Destination'</p>
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<p align="center">INTERMEDIATE CONSIGNEE(S) IN FOREIGN COUNTRY(IES)</p> <p align="center">None</p>	<p align="center">OTHER U.S. PARTY(IES) TO EXPORT</p> <p align="center">None</p>
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<p>APPLICANT'S REFERENCE NO.: Export Rev 0</p>	<p>ULTIMATE DESTINATION: See page 2</p>
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**CONDITIONS, NOTES, AND DESCRIPTIONS OF 10 CFR PART 110, APPENDIX P,
BYPRODUCT AND SOURCE MATERIALS TO BE EXPORTED**
(NOTE: SEE PAGE 3 FOR DEFINITIONS OF CATEGORY 1 AND CATEGORY 2)

Export to countries listed in "Country(ies) of Ultimate Destination" of Category 1 and Category 2 quantities of Ir-192 (Category 1 shipments may not to exceed 740 TBq), Category 1 and Category 2 quantities of Se-75 (Category 1 shipments may not to exceed 277 TBq) and Category 2 quantities of Yb-169 (not to exceed 7.4 TBq per shipment), for industrial radiography use to licensed distributors and end users is authorized. **For Category 1 exports, see conditions on Page 2.**

Licensee is responsible for compliance with all applicable export, and other domestic regulatory requirements, including all terms and conditions of domestic material possession licenses. Licensee, if not already submitted with your application, must submit information required by 10 CFR § 110.32(d) and pertinent documentation required by 10 CFR § 110.32(g) at least **24 hours prior to shipment**. See Page 3 for Mandatory Pre-shipment Notifications.

License expiration date is based on established limits.

Neither this license nor any right under this license shall be assigned or otherwise transferred in violation of the provisions of the Atomic Energy Act of 1954, as amended.

This license is subject to the right of recapture or control by Section 108 of the Atomic Energy Act of 1954, as amended, and to all of the other provisions of said Acts, now or hereafter in effect and to all valid rules and regulations of the NRC.

THIS LICENSE IS INVALID UNLESS SIGNED BELOW
BY AUTHORIZED NRC REPRESENTATIVE

SIGNATURE: 

NAME AND TITLE: David L. Skeen, Deputy Director
Office of International Programs

DATE OF ISSUANCE: November 15, 2017

ULTIMATE DESTINATION(S):

Albania, Algeria, Antigua and Barbuda, Aruba, Armenia, Azerbaijan, Bahamas, Bahrain, Bangladesh, Barbados, Belize, Benin, Bolivia, Bosnia and Herzegovina, Botswana, Brunei, Burkina Faso, Burundi, Cambodia, Cameroon, Cape Verde, Central African Republic, Chad, Chile, Columbia, Comoros, Congo (Brazzaville), Congo (Kinshasa), Costa Rica, Côte d' Ivoire, Croatia, Curacao, Dominica, Dominican Republic, East Timor, Ecuador, Egypt, El Salvador, Ethiopia, Equatorial Guinea, Eritrea, Fiji, Gabon, Monaco, Gambia, Georgia, Ghana, Grenada, Guatemala, Guinea, Guinée-Bissau, Guyana, Haiti, Holy See, Honduras, Indonesia, Jamaica, Jordan, Kenya, Kingdom of Saudi Arabia, Kosovo, Kiribati, Kuwait, Kyrgyzstan, Laos, Lebanon, Lesotho, Liberia, Liechtenstein, Macau, Macedonia, Madagascar, Malaysia, Malawi, Maldives, Mali, Malta, Marshall Islands, Mauritania, Mauritius, Federal States of Micronesia, Moldova, Mongolia, Montenegro, Morocco, Mozambique, Nauru, Nepal, Nicaragua, Niger, Nigeria, Oman, Palestinian Territories, Palau, Panama, Papua New Guinea, Paraguay, Peru, Philippines, Qatar, Rwanda, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, Sao Tome and Principe, Senegal, Serbia, Seychelles, Sierra Leone, Singapore, Solomon Islands, Somalia, Sri Lanka, St. Maarten, Suriname, Swaziland, Tajikistan, Taiwan, Tanzania, Thailand, Togo, Tonga, Trinidad and Tobago, Tunisia, Turkmenistan, Tuvalu, Uganda, United Arab Emirates, Uzbekistan, Vanuatu, Venezuela, Vietnam, Zambia, and Zimbabwe.

**CONDITIONS, NOTES, AND DESCRIPTIONS OF 10 CFR PART 110, APPENDIX P,
BYPRODUCT MATERIALS TO BE EXPORTED**

ISOFLEX Radioactive, LLC, is prohibited from shipping 10 CFR Part 110 Appendix P Category 1 quantities of Ir-192 and Se-75 to the countries listed under 'Country(ies) of Ultimate Destination' until:

1. ISOFLEX Radioactive, LLC, has requested in writing from the U.S. Nuclear Regulatory Commission (NRC) to obtain specific consent from the destination's regulatory authority, on a case-by-case basis;
2. NRC has received and considered government-to-government consent pursuant to 10 CFR §110.42(e)(3); and
3. NRC has informed ISOFLEX Radioactive, LLC, in writing, that it is authorized to ship the materials to the ultimate consignee specified.

MANDATORY ADVANCED NOTIFICATIONS PER 10 CFR PART 110.50(c)

The following Advanced Notifications must be made to both the NRC and, in case of exports, the government of the importing country in advance of each shipment:

Advanced Notifications to the NRC are to be emailed to hoo.hoc@nrc.gov (preferred method) or faxed to the NRC at 301-816-5151. In the subject line of the email or on the fax cover page include: "10 CFR 110.50(c) Notification." For technical assistance, use the same e-mail address or call 301-816-5100.

Advanced Notifications to the government of the importing country must be emailed or faxed to the appropriate foreign government authorities. To locate the point-of-contact for international Prior Shipment Notifications see: <http://www-ns.iaea.org/downloads/rw/imp-export/import-export-contact-points.pdf>. In the subject line of the email or on the fax cover page include: "NOTIFICATION TO THE IMPORTING STATE PRIOR TO SHIPMENT OF CATEGORY 1 OR 2 RADIOACTIVE SOURCES." For technical assistance or for countries not listed, contact the Office of International Programs' export/import staff at 301-287-9056.

Table 1: Appendix P to Part 110 Category 1 and Category 2 Radioactive Material Threshold Limits

Radioactive Material	Category 1		Category 2	
	Terabequerels (TBq)	Curies (Ci) ¹	Terabequerels (TBq)	Curies (Ci) ¹
Americium-241 (Am-241)	60	1,600	0.6	16
Americium-241/Beryllium (Am-241/Be)	60	1,600	0.6	16
Californium-252 (Cf-252)	20	540	0.2	5.4
Curium-244 (Cm-244)	50	1,400	0.5	14
Cobalt-60 (Co-60)	30	810	0.3	8.1
Cesium-137 (Cs-137)	100	2,700	1.0	27
Gadolinium-153 (Gd-153)	1,000	27,000	10.0	270
Iridium-192 (Ir-192)	80	2,200	0.8	22
Plutonium-238 ² (Pu-238)	60	1,600	0.6	16
Plutonium-239/Beryllium ² (Pu-239/Be)	60	1,600	0.6	16
Promethium-147 (Pm-147)	40,000	1,100,000	400	11,000
Radium-226 ³ (Ra-226)	40	1,100	0.4	11
Selenium-75 (Se-75)	200	5,400	2.0	54
Strontium-90 (Y-90)	1,000	27,000	10.0	270
Thulium-170 (Tm-170)	20,000	540,000	200	5,400
Ytterbium-169 (Yb-169)	300	8,100	3.0	81

Calculation of Shipments Containing Multiple Sources or Radionuclides:

The "sum of fractions" methodology for evaluating combinations of radionuclides being transported is to be used when import or export shipments contain multiple sources or multiple radionuclides. The threshold limit values used in a sum of the fractions calculation must be the metric values (i.e., TBq).

I. If multiple sources and/or multiple radionuclides are present in an import or export shipment, the sum of the fractions of the activity of each radionuclide must be determined to verify the shipment is less than the Category 1 or 2 limits of Table 1, as appropriate. If the calculated sum of the fractions ratio, using the following equation, is greater than or equal to 1.0, then the import or export shipment exceeds the threshold limits of Table 1 and the applicable security provisions of this part apply.

II. Use the equation below to calculate the sum of the fractions ratio by inserting the actual activity of the applicable radionuclides or of the individual sources (of the same radionuclides) in the numerator of the equation and the corresponding threshold activity limit from the Table 1 in the denominator of the equation. Ensure the numerator and denominator values are in the same units and all calculations must be performed using the TBq (i.e., metric) values of Table 1.

- R1 = activity for radionuclides or source number 1
- R2 = activity for radionuclides or source number 2
- RN = activity for radionuclides or source number n
- AR1 = activity limit for radionuclides or source number 1
- AR2 = activity limit for radionuclides or source number 2
- ARN = activity limit for radionuclides or source number n

$$\sum_1^n \left[\frac{R_1}{AR_1} + \frac{R_2}{AR_2} + \frac{R_n}{AR_n} \right] \leq 1$$

¹ The values to be used to determine whether a license is required are given in TBq. Curie (Ci) values are provided for practical usefulness only and are rounded after conversion.

² The limits for exports of Pu-238 and Pu-239/Be can be found in § 110.21.

³ Discrete sources of Radium-226.

Savoy, Joanne

From: Savoy, Joanne
Sent: Thursday, November 16, 2017 7:37 AM
To: kjs@iso-rad.com; Tony Bustillo
Cc: DeLaBarre, Robin (DeLaBarreR@state.gov); 'Katie.Strangis@nnsa.doe.gov'; Aguilar, Santiago; Sauls, Ernest E (Rett) CIV DTRA J10 (US) (ernest.e.sauls.civ@mail.mil); Rodriguez-Luccioni, Hector; 'pete.dessaules@hq.doe.gov'; 'Jessica.Norles@nnsa.doe.gov'; 'randall.r.bennett@cbp.dhs.gov'; SEMONES, JONATHAN; 'Steven.Clagett@bis.doc.gov'; Chen, Michael (CONTR); Baker, Stephen; Habighorst, Peter; Savoy, Joanne; Owens, Janice
Subject: Export License Issued - PXB215a.00 and PXB215b.00
Attachments: Export License Issued to ISOFLEX Radioactive, LLC, PXB215a.00.pdf; Export License Issued to ISOFLEX Radioactive, LLC, PXB215b.00 .pdf

Good Morning Mr. Schehr,

The subject license (PXB215a.00 and PXB215b.00), was issued Wednesday, November 15, 2017. The PDF version is attached and the original will be mailed today. If you have any questions or concerns, please contact Joanne Savoy at 301-287-9092 or via e-mail at Joanne.Savoy@nrc.gov.

The NRC reminds licensees that, under current NRC regulations, imports of disused sources must either be authorized under a specific license or satisfy one of the exclusions to the definition of "radioactive waste" in 10 CFR 110.2 to be eligible for import under a general license. Of note, returned disused sources must be of U.S. origin to be eligible for import under a general license. In 2013 the NRC staff published a Branch Technical Position (BTP) providing additional guidance on this "of U.S. origin" requirement. This BTP was published in the Federal Register (78 Fed. Reg. 53,020; Aug. 28, 2013) and is also available in ADAMS at Accession No. ML13177A163.

Thank You,

Joanne Savoy

Joanne Savoy | Licensing Assistant
Office of International Programs
Export Controls and Nonproliferation Branch
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