

November 9, 2018

18-NWP-183

United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001
ATTN: Rulemakings and Adjudications Staff

Re: Nuclear Regulatory Commission Document Number 2018-23164 for License No. XW019; Docket No. 11005986; NRC-2012-7946 (Perma-Fix Northwest Richland, Inc. [PFNW])

Dear Rulemakings and Adjudications Staff:

The Washington State Department of Ecology (Ecology) would like to request a hearing on the August 30, 2018 PFNW application for license to export low-level radioactive waste (LLRW) to Mexico. Ecology is conducting expanded scoping for PFNW's dangerous waste regulations permit, State Environmental Policy Act Environmental Impact Statement (SEIS), and we believe the license application to be a related activity. Transportation of international mixed waste is not currently included in the scope of the existing SEIS for PFNW operations.

A few of the questions we would like the United States Nuclear Regulatory Commission to discuss in the hearing are:

- What National Environmental Policy Act analysis, if any, supports this action?
- What are the planned transportation routes between the Mexican border and PermaFix?

When Ecology contacted other organizations, they expressed interest in attending a hearing as well. Ecology would publicize a hearing through our social media and web page notices.

If you have questions or need further information, please contact me at john.price@ecy.wa.gov or (509) 372-7921.

Sincerely,

John B. Price
Tri-Party Agreement Section Manager
SEPA Responsible Official
Nuclear Waste Program

so

cc: Ken Niles, ODOE
Richard Grondin, PFNW
Becky Wiegman, PFNW
Earl Fordham, WDOH