

PDR *MSB*



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUL 29 1982

MEMORANDUM FOR: The File  
FROM: R. Neal Moore  
Senior Licensing Officer  
Office of International Programs  
SUBJECT: EXPORTS TO LIBYA

In April, for foreign policy reasons, the Executive Branch revoked most of the existing Commerce Department general export licenses for Libya, in effect, treating Libya, for export control purposes, like Cuba, Vietnam, North Korea and Kampuchea. Short'y after this action, IP informally asked State Department/OES whether the Executive Branch also wished to recommend that NRC revoke its general export licenses applicable to Libya. IP was advised that no such recommendation was being considered at that time but, if a decision was later made to request revocation of the general licenses, we would be advised formally. (One possible reason for not revoking NRC's general licenses for Libya is that Commerce's general licenses, in contrast to NRC's, cover a number of fairly sophisticated commodities such as oil well equipment, industrial gas turbines, etc.)

One recent result of this Executive Branch decision, involved a U.S. firm which had obtained a Commerce export license for a large quantity of industrial equipment for Libya prior to the revocation of the Libyan general licenses. A part of this order involved an iridium-192 industrial radiography device. The iridium-192 was subject to an NRC general export license while its container (depleted uranium), is licensed by Commerce. At the time the iridium-192 was ready for shipment the Commerce general license covering the export of the container had been revoked. Rather than incur a delay in shipment, which would have been the result of applying and waiting for a separate Commerce Department specific license for the iridium-192 container, the firm decided to ship the iridium-192 to the U.K., where it would be transferred to a European container and shipped to Libya. Both NRC and Commerce staffs were informed of the firm's plans and indicated that no U.S. export restrictions were being violated.

While the above export raises no special concerns, in view of the continuance of the Commerce restrictions on exports to Libya, the staff informally has asked the State Department to reconfirm that the Executive Branch does not plan to request NRC to revoke its general export licenses applicable to Libya. We expect it will be several weeks before we receive their response.

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