

October 26, 1999  
PY-CEI/OIP-0001L

Attention: Mr. Ronald D. Hauber  
United States Nuclear Regulatory Commission  
Office of International Programs  
Washington, D.C. 20555

Subject: Export Under 10 CFR Part 110 General Licenses

Dear Mr. Hauber:

This letter is to document the discussions held between the NRC staff and the Perry Nuclear Power Plant (PNPP) staff on October 19 and October 21, 1999, regarding the proposed shipment of a pump to Chalk River, Ontario, Canada.

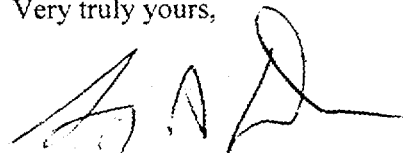
The pump to be exported is a centrifugal pump used in an auxiliary support system of the power plant. The pump is not especially designed for use in a nuclear reactor. Additionally, this pump is outside of the first isolation valve from the reactor primary system (i.e., separate from the illustrative list in Appendix A of the regulation). Therefore, the pump is not considered to be nuclear reactor equipment under NRC export licensing authority pursuant to 10 CFR 110.26.

This pump has been characterized to contain the quantity of contaminants as indicated on the enclosure to this letter. The amounts of the nuclides contained in this device are within the criteria of 10 CFR 110.21, General License for the Export of Special Nuclear Material. Additionally, the contaminants contained in this device, (i.e., pump) meet the requirements of 10 CFR 110.23, General License for the Export of Byproduct Material.

The determination is that shipment of this pump to Canada for rebuild and return to the PNPP is in compliance with the requirements of 10 CFR 110, Export and Import of Nuclear Equipment and Material. Specifically, based on the discussions with your staff the export is allowed under the general licenses of 10 CFR 110.21 and 110.23; submittal of an NRC Form 7 is not required; and, the pump is not subject to 10 CFR 110.26.

No regulatory commitments are contained in this letter or its enclosure. If you have questions or require additional information, please contact Mr. Sterling W. Sanford, Senior Compliance Engineer-Regulatory Affairs, at (440) 280-5361.

Very truly yours,



Mr. Gregory A. Dunn  
Manager-Regulatory Affairs

Enclosure

F-12 - copies to  
B. Wright  
G. Kim, OGC  
K. Burke

Central files:  
IP-3 C

NRC FILE CENTER COPY

99-190

DF03

# Package Characterization Report

Printed on: 10/12/1999 during Package Characterization  
 Method Used: Gross Gamma

Date:	10/12/1999	Liner Serial No.	
Package ID:	Perry RWCU Pump G33	DOT Package Class:	Type A
NRC Waste Class:	A	Physical Form:	S
Waste Description:	Perry RWCU Pump	Container Type:	17-H DRUM
Chemical Form:	Metal Oxides	Weight % Chelating Agent:	N/A
Chelating Agent:	N/A	Package Volume (Ft3):	7.5
Waste Volume (Ft3):	1.35	Package Weight (lbs):	725
Waste Weight (lbs):	675	Characterization Dist (in):	12
Dose / Curie Factor:	1.436		

Contact Rad Level (mR/hr): 14000      1 Meter Rad Level (mR/hr): 1700      Survey Date: 06/09/1999

Nuclide:	mCi:	Nuclide:	mCi:	Nuclide:	mCi:
H-3	4.20E-02	Mn-54	4.93E+01	Fe-55	2.16E+02
Co-57	3.42E-01	Co-58	2.08E+01	Co-60	7.76E+02
Ni-63	3.63E+00	Zn-65	8.75E+02	Sr-89	1.09E-01
Sr-90	3.05E-01	Ag-110m	8.77E-01	Cs-137	1.57E+00
Ce-144	2.59E+00	Pu-238	1.91E-03	Pu-239	4.57E-04
Pu-241	9.26E-02	Am-241	4.34E-04	Cm-242	6.91E-04
Cm-243	1.02E-03				
<b>Total:</b>					<b>1.95E+03</b>

Entered Dose Rates in mR/hr  
1700

Contamination levels in DPM/100cm2			
Fixed Beta/Gamma	2.29e14	Fixed Alpha	0
Remove Beta/Gamma	0	Remove Alpha	0
Total Beta/Gamma	2290000000000	Total Alpha	0

**Part 61 Information**

Sample ID : Z11139  
 Sample Date : 11/18/1998  
 Activity Units : uCi/gm  
 Analysis Vendor : Duke