



August 30, 1999
LDG-031-99

Mr. Ronald D. Hauber
Director for Non-Proliferation, Exports & Multilateral Relations
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*IW008
11005144*

Dear Mr. Hauber:

Starmet CMI (CMI) requests, under 10CFR110.27, the issuance of a general license authorization to import radioactive depleted uranium turnings to our Barnwell, South Carolina facility.

*10/29 11:57 AM
Supt 1*

The CMI facility operates various processes in the conversion of uranium hexafluoride to uranium metal products, including the production of uranium oxide. CMI is permitted to receive this material and to perform the described processing under our South Carolina Department of Health & Environmental Control (SCDHEC) Radioactive Material License Number 322. A copy of this license is attached for Department review.

The depleted uranium material to be imported is the machined swarf/turnings from the manufacture of a component part of ammunition being produced on a Ministry of Defense contract (CB/AS2A) at the Royal Ordnance facility in the United Kingdom. Additionally there is a quantity of solid waste in the form of cylindrical pieces arising from obsolete designs from the development phase of this contract. A copy of the export license application submitted by Royal Ordnance PLC to the Department of Trade and Industry in London is attached for review.

It should be noted that the consignee, Starmet Corporation, was the original manufacturer/supplier of this depleted uranium material and has developed a recycling process for depleted uranium materials. This converts the metal to oxide that is then used in radiation shielding products manufactured by Starmet. All the material to be imported will have been originally manufactured by Starmet.

In order to prevent combustion of the finely divided swarf/turnings it must be stored under oil. This oil becomes contaminated and will also require processing by Starmet CMI prior to reuse or disposal.

Several shipments will be required over a four year period of the MoD production contract and the 80,000 kilograms will be the maximum total quantity to be sent for recycling along with a maximum of 45,000 liters of mineral oil. Each shipment

Starmet CMI

7/16/99 copy to PDR + DCS

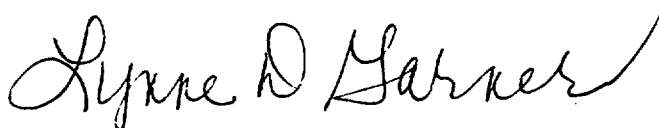
Page 2 of 2
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08/30/99

will use British Nuclear Fuels LTD approved ISO freight containers. The exact quantity of material per shipment cannot be predetermined, as it is dependent on the actual size of the chips, which comprise the machined material, but there will be a maximum of 16,800 kilograms per shipment based on a gross weight of 20,000 kilograms for the ISO container. It is anticipated that shipments will commence in April 2000.

Enclosed is a check in the amount of \$4,800 for the initial application fee in accordance with 10CFR170.31. If you have any questions or require any further information, please do not hesitate to contact me at 803-259-2321.

Sincerely,

STARMET CMI



Lynne D. Garner
Regulatory Affairs Coordinator

Attachments (2)

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No: 322
Amendment No: 23

Starmet CMI
P.O. Box 1366, Hwy. 80
Barnwell, SC 29812

In accordance with the letter dated April 12, 1999, signed by Lynne D. Garner, S.C. Radioactive Material License No. 322 is hereby AMENDED:

TO CHANGE:

Condition 11.

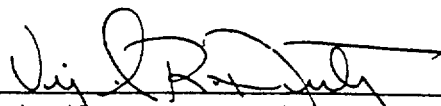
11. Radioactive material shall be used by, or under the supervision of Douglas F. Grotheer (President), Lynne D. Garner, (RSO), Sherman Brady, Daniel Macias, C. David Wilson, C. Lawson Bailey, and James C. Cornwell. Other authorized users may be designated by the Radiation Safety Committee who have successfully completed the licensee's radiation safety training program, and have received approval from the Department. The licensee shall maintain training and qualification records at the location specified in Condition No. 9 for all individuals authorized to enter areas restricted due to the presence of radiation or radioactive materials.

For the South Carolina Department
of Health and Environmental Control

Date of Issuance April 22, 1999

DHEC 812 (11/81)

DHEC/BRH/sla

By: 
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No: 322
Amendment No: 22

Starmet CMI
P.O. Box 1366, Hwy. 80
Barnwell, SC 29812

In accordance with the letter dated May 7 and June 23, 1998, signed by Eric E. Bickel, S.C. Radioactive Material License No. 322 is hereby AMENDED:

TO ADD:

28. Except as specifically provided otherwise, the licensee shall possess and use radioactive material described in Items 5, 6, and 7 of this license in accordance with statements, representations, and procedures contained in:
- a. application dated July 31, 1981, signed by J. L. Jenkins.
 - b. letters dated September 20, 27 and 31, 1981, signed by R. L. Toole.
 - c. letter dated November 17, 1981, amendment request with "Report on the Proposed New Facility for conversion of UF₆ and UF₄", and revisions thereto, dated September 4, 1984 signed by Vincent G. Minutolo.
 - d. letters dated January 24, 1985 and June 6, 1986 signed by Vincent G. Minutolo.
 - e. renewal application with attachments dated October 27, 1986 and letter with attachment dated December 15, 1986 signed by R. L. Toole.
 - f. letters dated October 14, 1987 and January 19, 1988, signed by R. L. Toole.
 - g. renewal applications with attachments dated December 4, 1991 and letter dated February 11, 1992 signed by R. L. Toole.
 - h. application dated October 14, 1994 and letter with attachment dated July 7, 1995 signed by R. L. Toole.
 - I. letters with attachments dated March 26, 1996, May 2, 1996, May 14, 1996 and June 12, 1996 signed by C. David Wilson.
 - j. application for renewal dated November 27, 1996 and submittal dated April 16, 1997 signed by Sherman D. Brady.
 - k. application dated February 27, 1997 and submittal dated April 16, 1997 signed by Sherman D. Brady.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
RADIOACTIVE MATERIAL LICENSE
SUPPLEMENTARY SHEET

License No: 322
Amendment No: 22

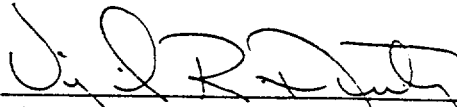
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- l. submittal with attachments dated January 7, 1998 signed by Eric E. Bickel.
 - m. submittal with attachments dated May 7, and June 23, 1998 signed by Eric E. Bickel.

For the South Carolina Department
of Health and Environmental Control

Date of Issuance June 29, 1998

DHEC 812 (11/81)

DHEC/BRH/sla

By: 
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No: 322
Amendment No: 21

Starmet CMI
P.O. Box 1366, Hwy. 80
Barnwell, SC 29812

In accordance with the letter dated January 23, 1998, signed by Eric E. Bickel, S.C. Radioactive Material License No. 322 is hereby AMENDED:

TO CHANGE:

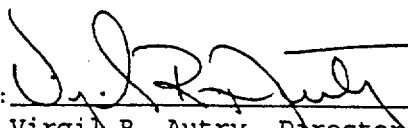
8. Authorized Use
- B. (1) To receive, electroplate, paint and distribute newly manufactured depleted uranium counterweights.
- (2) To receive, refurbish, electroplate, paint and distribute newly manufactured depleted uranium counterweights.

Condition 11.

11. Radioactive material shall be used by, or under the supervision of Douglas F. Grotheer (President), Eric E. Bickel (RSO), C. David Wilson, C. Lawson Bailey, and James C. Cornwell. Other authorized users may be designated by the Radiation Safety Committee who have successfully completed the licensee's radiation safety training program, and have received approval from the Department. The licensee shall maintain training and qualification records at the location specified in Condition No. 9 for all individuals authorized to enter areas restricted due to the presence of radiation or radioactive materials.

For the South Carolina Department
of Health and Environmental Control

Date of Issuance February 26, 1998

By: 
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

DHEC 812 (11/81)

DHEC/BRH/sla

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
RADIOACTIVE MATERIAL LICENSE

License No: 322
Amendment No: 20

Starmet CMI
P.O. Box 1366, Hwy. 80
Barnwell, SC 29812

In accordance with the letter dated January 7, 1998 signed by Eric E. Bickel, S.C. Radioactive Material License No. 322 is hereby AMENDED:

TO CHANGE:

- | | | |
|-------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| 5. Radioactive Material | 6. Chemical and/or
Physical Form | 7. Maximum radioactivity
and/or quantity of
materials which
license may possess at
any one time. |
| A. Uranium (Natural) | A. Any form, including
hexafluoride (UF ₆),
tethafluoride (UF ₆),
metal and oxide (s) | A. 250 metric tons,
total all forms |

TO RESCIND:

12. Condition 12 is hereby rescinded.

TO ADD:

28. Except as specifically provided otherwise, the licensee shall possess and use radioactive material described in Items 5, 6, and 7 of this license in accordance with statements, representations, and procedures contained in:
- a. application dated July 31, 1981, signed by J. L. Jenkins.
 - b. letters dated September 20, 27 and 31, 1981, signed by R. L. Toole.
 - c. letter dated November 17, 1981, amendment request with "Report on the Proposed New Facility for conversion of UF₆ and UF₄", and revisions thereto, dated September 4, 1984 signed by Vincent G. Minutolo.
 - d. letters dated January 24, 1985 and June 6, 1986 signed by Vincent G. Minutolo.
 - e. renewal application with attachments dated October 27, 1986 and letter with attachment dated December 15, 1986 signed by R. L. Toole.
 - f. letters dated October 14, 1987 and January 19, 1988, signed by R. L. Toole.
 - g. renewal applications with attachments dated December 4, 1991 and letter dated February 11, 1992 signed by R. L. Toole.

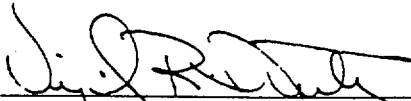
SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
RADIOACTIVE MATERIAL LICENSE
SUPPLEMENTARY SHEET

License No: 322
Amendment No: 20

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- h. application dated October 14, 1994 and letter with attachment dated July 7, 1995 signed by R. L. Toole.
 - i. letters with attachments dated March 26, 1996, May 2, 1996, May 14, 1996 and June 12, 1996 signed by C. David Wilson.
 - j. application for renewal dated November 27, 1996 and submittal dated April 16, 1997 signed by Sherman D. Brady.
 - k. application dated February 27, 1997 and submittal dated April 16, 1997 signed by Sherman D. Brady.
 - l. submittal with attachments dated January 7, 1998 signed by Eric E. Bickel.

For the South Carolina Department
of Health and Environmental Control

Date of Issuance January 16, 1998

By: 
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

DHEC 812 (11/81)

DHEC/BLWM/0198

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No: 322
Amendment No: 19

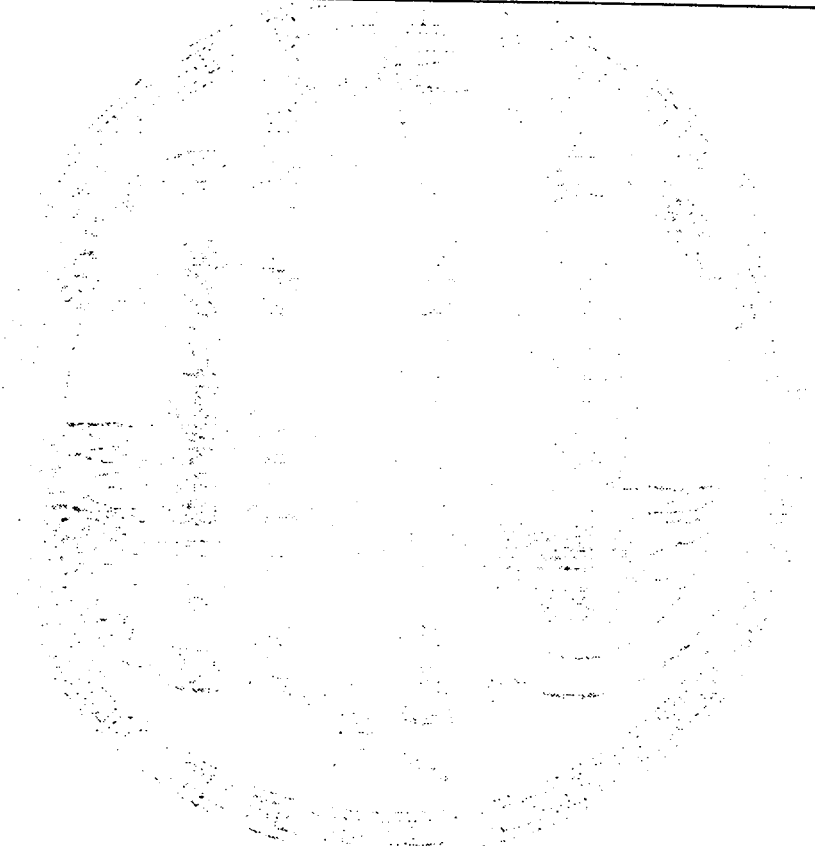
Starmet CMI
P.O. Box 1366, Hwy. 80
Barnwell, SC 29812

In accordance with the letter dated September 26, 1997 signed by Eric E. Bickel, S.C. Radioactive Material License No. 322 is hereby AMENDED:

TO CHANGE:

Item 1. Name

1. Starmet CMI

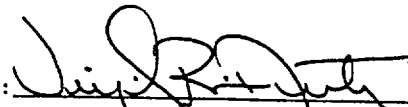


For the South Carolina Department
of Health and Environmental Control

Date of Issuance October 6, 1997

DHEC 812 (11/81)

DHEC/BRH/sla

By: 
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
RADIOACTIVE MATERIAL LICENSE

Pursuant to the Atomic Energy and Radiation Control Act, Section 13-7-40 et. seq. of S.C. Code of Laws of 1976, as amended, and Supplements thereto, and the South Carolina Department of Health and Environmental Control Regulation 61-63, Radioactive Material (Title A), and in reliance on statements and representations heretofore made by the applicant, a license is hereby issued authorizing the licensee to receive, acquire, possess and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules and regulations of the South Carolina Department of Health and Environmental Control now or hereafter in effect and to any conditions specified below.

Amendment No. 18 Amends

LICENSEE		3. License Number:
1. Name: Carolina Metals, Inc.		322 in its entirety.
2. Address: P.O. Box 1366, Hwy. 80 Barnwell, SC 29812		4. Expiration Date: December 31, 2001
5. Radioactive Material (Element & Mass No.)	6. Chemical and/or Physical Form	7. Maximum Radioactivity and/or quantity of material which licensee may possess at any one time
A. Uranium (Natural)	A. Any form, including hexafluoride (UF ₆), tetrafluoride (UF ₄), metal and oxide(s)	A. 50 metric tons, total all forms
B. Uranium (Depleted)	B. Any form, including: hexafluoride (UF ₆), tetrafluoride (UF ₄), metal, counterweights and oxide(s)	B. 7550 metric tons, total all forms
C. Strontium-90	C. Calibration & reference sources (Eberline SN-1, and SN-2 or equivalent)	C. 5 millicuries maximum per source
D. Plutonium-239	D. Calibration & reference sources (Eberline DNS-1, DNS-16 and DNS-21 or equivalent)	D. 5 millicuries total
E. Americium-241	E. Analytical Samples	E. 12 nanocuries
F. Curium-242	F. Analytical Samples	F. 12 nanocuries
G. Curium-244	G. Analytical Samples	G. 12 nanocuries
H. Polonium-210	H. Analytical Samples	H. 24 nanocuries
I. Plutonium-239	I. Analytical Samples	I. 12 nanocuries
J. Radionuclides with Atomic Nos. 2-92	J. Trace material	J. 5 curies
K. Radionuclides with Atomic Nos. 93-103	K. Trace material	K. 100 grams

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No. 322
Amendment No. 18

L. Special Nuclear Material (SNM)	L. Any Form	L. 350 grams total of ²³⁵ U or 200 grams of ²³³ U or 200 grams of plutonium or any combination of these provided the sum of the ratios of the quantities does not exceed unity. The activities for Item 5D and I shall be included in the calculation of the sum of ratios.
M. Radionuclides with Atomic Nos. 2-92 Material	M. Solid	M. 100 curies total
N. Radionuclides with Atomic Nos. 93-103	N. Solid	N. 100 grams total

8. Authorized Use:

- A & B. (1) For the conversion of uranium hexafluoride (UF₆) to uranium tetrafluoride (UF₄) and the manufacture of metallic products in such forms as derbies for the purpose of sale or developmental activities.
(2) To be used in research and developmental activities to be conducted at the bench scale or pilot scale level.
- B. To receive, refurbish, manufacture, electroplate and distribute depleted uranium counterweights.
- D & E. To be used as calibration reference sources.
- E, F, G, H, & I. To be used as standard reference material by the analytical laboratory and health and safety department.
- J, K & L. To receive, possess, process and transfer as trace constituents in materials received for processing activities authorized under the license.
- M. For receipt in the form of surface contamination on scrap metals for storage, sectioning and melting into slabs/ingots.
- N. For receipt in the form of surface contamination on rolled metal sheets, ingots and shielded blocks.

Conditions

- 9. Radioactive material may only be used at the licensee's site stated in Item 2 above.
- 10. The licensee shall comply with the provisions of Title A, State of South Carolina Rules and Regulations for Radiation Control; Part I - General Provisions; Part III - Standards for Protection Against Radiation; and Part VI - Notices, Instructions, and Reports to Workers; Inspections.

SOUTH CAROLINA DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL
Radioactive Material License
Supplementary Sheet

License No. 322
Amendment No. 18

11. Radioactive material shall be used by, or under the supervision of Douglas F. Grothear (President), Eric S. Bickel (RSC), C. David Wilson, Douglas A. Krogh, and James C. Cornwell. Other authorized users may be designated by the Radiation Safety Committee who have successfully completed the licensee's radiation safety training program, and have received approval from the Department. The licensee shall maintain training and qualification records at the location specified in Condition No. 9 for all individuals authorized to enter areas restricted due to the presence of radiation or radioactive materials.
12. For the purpose of licensing, the UF₆ to UF₄ conversion facility is hereby inactive/non-operational as of August 7, 1995. Prior to reactivating this process, the licensee must notify the Department in writing and have this License Condition No. 12 amended. Prior to operation of the UF₆ to UF₄ conversion facility, final Health, Safety and Operational procedures for this process shall be submitted to the Department for approval.
13. Operations authorized by this license shall be conducted in accordance with the licensee's procedures and subsequent revisions and additions approved by the Department. However, the licensee may, upon notification to the Department, but without Department approval, make minor changes to these procedures provided that:
 - a. The change does not affect requirements of any other license conditions in this license;
 - b. The change does not increase the potential for personnel exposures;
 - c. The change does not diminish operational safety;
 - d. The change does not increase the potential for release of radioactive material to unrestricted areas; and
 - e. The change does not reduce the licensee's record keeping and reporting system.The licensee shall maintain a record of these changes including evaluations which provide the basis of the change.
The licensee's Radiation Safety Committee shall review and approve all operational health and safety procedures.
14. The licensee is authorized to operate an in-house laundry for the purpose of cleaning and decontaminating the licensee's garments in accordance with procedures contained in letters submitted to the Department on January 24, 1984; February 16, 1984 and April 18, 1984.
15. Radioactive material shall be packaged and transported in accordance with the requirements of RHA 2.22 - Transportation of Radioactive Materials, Department Regulation 61-63, Radioactive Material (Title A).
16. Except for plutonium contained in a medical device designed for individual human application, no plutonium, regardless of form, shall be delivered to a carrier for shipment by air transport or transported in an aircraft by the licensee except in packages, the design of which the U.S. Nuclear Regulatory Commission has specifically approved for transport of plutonium by air.
17. The licensee shall transport and dispose of low level radioactive waste in accordance with Department Regulation 61-83 and applicable disposal site requirements. Unused feedstock material and radioactive wastes including secondary waste streams generated as a result of activities performed for each project authorized under Item Nos. 8. A(2) and B(2) and 8. M & N, shall be returned to the owner of the sample materials unless otherwise authorized by the Department.

South Carolina Department of Health and Environmental Control
Radioactive Material License
Supplementary Sheet

License No. 322
Amendment No. 18

18. Any mixed low-level radioactive waste defined as waste that contains radioactivity and either (1) listed hazardous waste in Subpart D, 40CFR 261, or, (2) waste that exhibits any of the hazardous waste characteristics identified in Subpart C, 40CFR 261, generated as a result of the activities authorized under Item Nos. 8. A(2) and B(2) and 8. M and N and/or encountered during the shipment of radioactive material shall be transported back to the owner of the sample materials in accordance with applicable regulatory requirements unless otherwise authorized by the Department.
19. Prior to the receipt and use of radioactive materials for each project authorized under Item Nos. 8. A(2) and B(2) and 8. M and N, the licensee shall submit to the Department a certification from the owner of the materials that the products and wastes resulting from the activities authorized under the license will be allowed to be shipped back to the owner's facility or arrangements have been made regarding the handling of the products. The licensee shall not store the manufactured products, generated wastes and unused materials for processing from all activities for more than six (6) months after the receipt of each shipment.
20. The licensee shall notify in writing the Director, Division of Radioactive Waste Management, Bureau of Land & Waste Management, Department of Health and Environmental Control, prior to receiving the materials and engaging in a new project authorized under Item Nos. 8. A(2) and B(2) and 8. M and N, for review and approval. The notification shall include the activity, type and volume of materials involved in the project, duration and estimated completion date of each project and description of equipment to be used.
21. A monthly processing report of the activities authorized under Item Nos. 8. A(2) and B(2) and 8. M and N, shall be submitted to the Department. The report shall include date, volume and activity of the shipments received; date, volume and activity of products and waste shipped; and manner of waste disposition and management of generated products.
22. The licensee shall conduct a physical inventory every six (6) months to account for all radioactive material received and possessed under the license. The records of the inventories shall be for inspection by the Department, and shall include the quantities and kinds of licensed material, location of radioactive material, and the date of the inventory.
23. A monthly waste inventory report shall be submitted to the Department by the 15th day of the following month.
24. An annual environmental monitoring report for the previous year shall be submitted to the Department on or before March 15 of the current year. The effluents concentration shall be reported in units consistent with the regulations.
25. The licensee, shall, to the extent necessary, continue the employment of all personnel involved in the operation of the facility in accordance with all the requirements of the license and applicable regulations and, in the event replacement of employees become necessary, only individuals of comparable qualifications and experience will be hired.
26. Prior to receipt and use of radioactive for each new project authorized under Item Nos. 8. A(2) and B(2) and 8. M and N, the licensee shall establish a financial mechanism satisfactory to the Department in the form and amount for the purpose of disposing and decontaminating of all equipment, facilities and property which may be contaminated with radioactive materials during operations at the facility for that project.
27. The licensee shall submit to the Department an updated Decontamination and Decommissioning Plan (D & D) which outlines the manner of decommissioning the facilities equipment and activities authorized under the license every five (5) years for review and approval. The D & D plan shall be updated to include any changes to the facility

South Carolina Department of Health and Environmental Control
Radioactive Material License
Supplementary Sheet

License No. 322
Amendment No. 18

including construction of new buildings, addition of equipment, relocation of equipment and processes, etc. The licensee shall submit a final version of the D & D plan one (1) year in advance of an anticipated license termination.

28. Except as specifically provided otherwise, the licensee shall possess and use radioactive material described in Items 5, 6, and 7 of this license in accordance with statements, representations, and procedures contained in:
- a. application dated July 31, 1981, signed by J. L. Jenkins.
 - b. letters dated September 20, 27 and 31, 1981, signed by R. L. Toole.
 - c. letter dated November 17, 1981, amendment request with "Report on the Proposed New Facility for Conversion of UF₆ and UF₄", and revisions thereto, dated September 4, 1984 signed by Vincent G. Minutolo.
 - d. letters dated January 24, 1985 and June 6, 1986 signed by Vincent G. Minutolo.
 - e. renewal application with attachments dated October 27, 1986 and letter with attachment dated December 15, 1986 signed by R. L. Toole.
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 - k. application dated February 27, 1997 and submittal dated April 16, 1997 signed by Sherman D. Brady.

For the South Carolina Department
of Health and Environmental Control

Date of Issuance September 16, 1997

By: Virgil R. Autry
Virgil R. Autry, Director, Div. of
Radioactive Waste Management

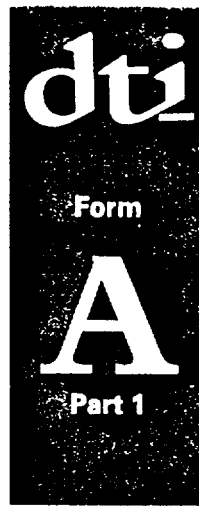
DHEC 812 (11/81)

DHEC/BRH/0897

Department of Trade and Industry
Export Licencing Unit
Kingsgate House
66-74 Victoria Street
London SW1E 6SW

☎ (071) 215 8070
Telex 936069 DTIKH G
Fax No (071) 215 8564
(071) 215 8202

Export Licence Application



For official use only
Official reference

A **Important: this form will be returned to you if it is not fully completed**

It is **essential** that you read the separate set of guidance notes before completing this form

Please answer every question. If a question does not apply to you, or your answer is in the negative, please say so.

Always send in the completed application form plus at least 2 photocopies, or 5 photocopies if the exports fall under heading Group 1 of Part III of Schedule 1 (Arms and Military Equipment). Failure to do so will delay processing the application.

To facilitate optical character recognition this form **must** be typed.

Please give as much notice as possible of your intention to export. You are advised not to enter into a binding contract or to start special production until the export licence has been issued.

For Official Use Only

Date Received

- 1 Consignor's name
ROYAL ORDNANCE PLC
- 2 Address
GLASCOED
USK
MONMOUTHSHIRE
Postcode NP5 1XL
- 3 Nature of Consignor's business
DEFENCE EQUIPMENT MANUFACTURER
- 4 Consignor's Reference
3001018
- 5 Consignee's Name
STARMET CORPORATION
- 6 Address
2229 MAIN STREET
CONCORD
MASSACHUSETTS
01742
Country USA
- 7 Nature of Consignee's business
METAL ALLOY MANUFACTURE
- 8 (i) Proposed date of shipment
OCTOBER 1998 to DECEMBER 2002
(ii) Export of firearms to EC countries:
state estimated date of arrival in
Member State
NOT APPLICABLE
- 9 Name of end user
AS BOX 5
- 10 Address
AS BOX 6

Part 1 continued

Please answer all questions and put a cross in all appropriate boxes. The provision of information in these sections is essential together with the necessary supporting documentation to help avoid delays in dealing with this application. **THIS FORM WILL BE RETURNED TO THE EXPORTER IF IT IS NOT FULLY COMPLETED.**

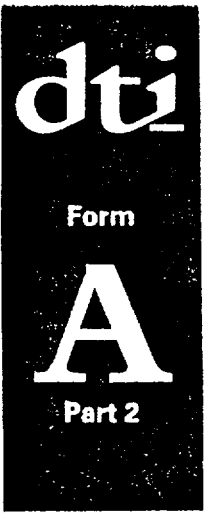
- | | | | |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------------------|
| 5 | Are the goods specially designed or modified for nuclear use? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> |
| 6 | Are the goods specially designed or modified for military use, or for development or production of military goods? | Yes
<input checked="" type="checkbox"/> | No
<input type="checkbox"/> |
| 7 | Do the goods fall within the description specified in paragraph 2 of Part II of Schedule 1 of the Export of Goods (Control) Order? | Yes
<input type="checkbox"/>
↓
Go to Question 8 | No
<input checked="" type="checkbox"/>
↓
Go to Question 10 |
| 8 | Are the goods intended or likely to be used in the development, production, handling, operation, delivery, waste disposal, detection, identification or storage of nuclear, chemical or biological weapons, or of the missiles capable of delivering such weapons? | Yes
<input type="checkbox"/>
↓
Go to Question 10 | No
<input type="checkbox"/>
↓
Go to Question 9 |
| 9 | Do you know, or have grounds for suspecting, that the goods might be used as described in Question 8? | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> |
| 10 | Intended end use of the goods | | |

RECYCLING TO OXIDE FOLLOWED BY USE IN A PROPRIETARY RADIATION SHIELDING PRODUCT OF STARMET CORPORATION



If the goods/technology are for temporary export you **must** inform Export Licensing Unit of the date they are returned to the UK or Isle of Man, together with evidence of reimportation.

- | | | | | |
|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------------------|-------------------------------------------|-------------------|
| 1 | Are the goods/technology to be temporarily exported (demonstration, exhibition, etc.)? | Yes
<input type="checkbox"/> | No
<input checked="" type="checkbox"/> | → Go to section E |
| If Yes for what purpose? | | | | |
| 2 | Will the goods/technology remain under the control of the exporter throughout the period? | Yes
<input type="checkbox"/> | No
<input type="checkbox"/> | |
| If the answer is No , you must provide a written explanation of the reasons therefor to the Licensing Unit. | | | | |
| 3 | Do you have any other information to provide? | | | |



Official reference

Important Please complete **all** shaded parts only

Export Licence

Name of Consignor & full address for the return of the licence

ROYAL ORDNANCE PLC
 GLASCOED
 USK
 MONMOUTHSHIRE NP5 1XL
 FAO: MRS P MCGILL

Important if more space is needed, please **continue** on a separate **continuation sheet** (see **Guidance Notes page 5**)

Consignor's reference

3001018

Please indicate the number of continuation sheets which form part of this licence. Please state if none.

NONE

Consignee's Name and full address

STARMET CORPORATION
 2229 MAIN STREET
 CONCORD
 MASSACHUSETTS
 01742

Show in figures and words total value of goods/technology including those in continuation sheet(s)

(in figures) £656,500

(in words) SIX HUNDRED AND FIFTY SIX THOUSAND, FIVE HUNDRED POUNDS

Country of ultimate destination

UNITED STATES OF AMERICA

For the purpose of the Export of Goods (Control) Order for the time being in force made under the Import, Export and Customs Powers (Defence) Act 1939 the Secretary of State licenses the consignor above to export from the United Kingdom and the Isle of Man to the consignee and the country of ultimate destination above within a period of **2 years** (or 1 year for temporary export) from the date of this licence, the following goods; subject to the conditions attached or specified in the licence.

Full description of goods/technology to be exported. (including model number or type number where appropriate) <i>Warning</i> penalties may be imposed for false statements	Quantity	Value £ (State basis of valuation - see Guidance Note page 4)
DEPLETED URANIUM.	80,000 Kg	618,200.00
MINERAL OIL	45,000 LTRS	38,300.00
ITEMS ARE FREE ISSUE. VALUES SHOWN ARE FOR HM CUSTOMS PURPOSES ONLY		
Total of this page (in words)	SIX HUNDRED AND FIFTY SIX THOUSAND, FIVE HUNDRED POUNDS	
Total of this page £	656,500.00	



Signed on behalf of the Department of Trade and Industry

ELA NUMBER (Official use).....

ADDENDUM TO FORM A

If you know or have been informed that the goods for export are categorised as 1. MILITARY - only page 1 applies.

2. Dual-Use - pages 1,2 & 3 apply.

In ALL cases a signature is required on page 3 and the whole document should be returned.

EXPORT LICENCE APPLICATION DATED:..... 06/08/98

NAME OF APPLICANT:..... ROYAL ORDNANCE PLC

FOR EXPORT OF GOODS TO:..... United States of America

CONSIGNOR'S REFERENCE:..... 3001018

CHANGES TO QUESTIONS C7, C8 AND C9 AS FROM 1 JULY 1995

As a result of changes to export control arrangements stemming from the introduction of a new EC regulation (Council Regulation (EC) No 3381/94), questions C7, C8 and C9 of Form A need no longer be answered. Instead answer the questions below

PLEASE CIRCLE THE ANSWER THAT APPLIES

- 1 Have you been informed by the authorities, or are you otherwise aware, that the goods are or may be intended to be used, wholly or in part, in connection with the development, production, handling, operation, maintenance, storage, detection, identification or dissemination of chemical, biological, or nuclear weapons or the development, production, maintenance or storage of missiles capable of delivering such weapons?

Yes

No

If yes please go back to question C10 or Form A.

- 2 Do you have grounds for suspecting that the goods might be used, wholly or in part, in connection with an activity referred to in question 1 above?

Yes

No

NOW RETURN TO QUESTION C10 ON FORM A

ADDITIONAL INFORMATION

Please provide the following information. The answers that you give will be inserted in the relevant boxes on the licence.

1. a) Please say in which country the finished goods are currently located.

GREAT BRITAIN _____

OR b) If the goods do not yet exist in their finished form (i.e., as described in this application) and will take on that form in the UK or another Member State, please write "GB" or give the name of the other Member State, as appropriate.

~~GOODS EXIST IN FINISHED FORM~~ _____

2. If you intend to export the finished goods from the Community, and, when doing so, you currently plan to enter the goods into Customs Export Procedure in a Member State other than the UK, please say which Member State.

~~EXPORT DIRECT FROM GREAT BRITAIN~~ _____

(NB Inserting the name of a Member State here does not affect your right subsequently to export the goods from another point in the European Community)

3 Please give below the names, addresses, telephone and fax numbers of appropriate points of contact in the countries given in your answers to Questions 1 & 2

NAME: MRS P A MCGILL.....

ADDRESS: ROYAL ORDNANCE PLC.....

GLASCOED, USK.....

MONMOUTHSHIRE.....

NP5 1XL.....

TELEPHONE: 01291 674113.....

FAX: 01291 674223.....

SIGNATURE OF APPLICANT: P.A. McGill.....
(AS ON FORM A)

DATE: 6/8/98

Additional Information

Consignor's Reference : SAP 3061018

The depleted uranium waste material is the machined swarf/turnings from the manufacture of a component part of ammunition being produced on a Ministry of Defence contract (CB/AS2A). Additionally there is a quantity of solid waste in the form of cylindrical pieces arising from obsolete designs from the development phase of this contract.

In order to prevent combustion of the finely divided swarf/turnings it must be stored under oil. This oil becomes contaminated and will also require reprocessing by Starmet Corporation prior to reuse or disposal.

It should be noted that the consignee, Starmet Corporation, was the original manufacturer/supplier of this depleted uranium material and has developed a recycling process for depleted uranium waste. This converts the metal to oxide which is then used in radiation shielding products manufactured by Starmet. All the material to be exported will have been originally manufactured by Starmet

Several shipments will be required over the four year period of the MoD production contract and the 80,000 Kg will be maximum total quantity to be sent for recycling along with a maximum of 45,000 litres of mineral oil. Each shipment will use British Nuclear Fuels Ltd approved ISO freight containers. The exact quantity of material per shipment cannot be pre-determined as it is dependant on actual size of the chips which comprise the machined waste but there will be a maximum of 16.800 Kg per shipment based on a gross weight of 20,000 Kg for the ISO container.