

August 7, 2006

MEMORANDUM TO: Larry W. Camper, Director
Division of Waste Management
Office of Nuclear Material Safety and Safeguards

FROM: Margaret M. Doane, Deputy Director **/RA/ by Stephen Dembek for**
Office of International Programs

SUBJECT: PROPOSED IMPORT OF RADIOACTIVE WASTE FROM FRANCE
(APPLICATION NO. IW018)

Enclosed is an application for a license (IW018), received by the Nuclear Regulatory Commission (NRC) from AREVA NP, Inc., (AREVA) located in Lynchburg, Virginia for the import of Class A and Class C radioactive waste. This waste was generated as a result of services performed by AREVA under contract to Dominion Generation, which involved building a replacement set of spare reactor coolant pump internals for the Surry Nuclear Power Plant also located in Virginia. AREVA arranged for the old reactor coolant pump internals to be exported to an AREVA facility in France where they were decontaminated and inspected for their overall condition. This process generated waste products in the form of contaminated protective clothing, rags and resin byproducts. The contract between AREVA and Dominion Generation called for all waste products to be returned to the U.S. for storage or disposal.

AREVA's import license application also explains that in 2004, two barrels of contaminated waste products were inadvertently shipped from France to the Lynchburg, Virginia facility without an NRC import license, which appears to be in violation of NRC import regulations. Although the Office of International Programs (OIP) will be addressing this matter separately, AREVA has included the radioactive waste received in 2004 in the quantities of material described in its current request. Thus, the material that has been and is proposed to be imported will be in the form of corrosion activation products and mixed fission products, predominantly ^{55}Fe , ^{60}Co , ^{63}Ni and ^{241}Pu . Most of these radioactive contaminants are contained on the resin. The radioactivity on the dry active waste also consists of corrosion activation products typically in the form of contaminated solid particles of metal oxides.

AREVA plans to pursue one or both of the following disposition paths:

- Disposition A - All radioactive waste received from France at AREVA's facility in Lynchburg, Virginia would be shipped to the Duratek facility in Tennessee for processing and be disposed of presumably as Dominion Generation/AREVA-generated waste in Barnwell, South Carolina.
- Disposition B - The contaminated dry active waste materials received from France at AREVA's facility in Lynchburg, Virginia would be shipped to Duratek for processing and be disposed of presumably as Dominion Generation/AREVA-generated waste in

Barnwell, South Carolina. The contaminated resins would be sent to the Surry plant for incorporation into that facility's resin holding tank.

Notice of receipt of this application was published in the Federal Register dated August 1, 2006 (71 FR 43527). OIP also requested assistance from the U.S. Department of State (DOS) to notify the Government of France and EURATOM authorities regarding the AREVA import license request and to obtain any comments that they might have in the context of the Joint Convention on the Safety of Spent Fuel Management and on Radioactive Waste Management. DOS views as to whether the subject import will be consistent with the Convention's guidelines were also requested. OIP plans to provide copies of this application as well as any public comments received in response to the Federal Register notice to officials in the States of Virginia, (where AREVA and the Surry plant are located), and Tennessee (where Duratek is located). We will also provide this information to the Southeast Low Level Radioactive Waste Compact Commission.

I would greatly appreciate receiving a response within two weeks from the date of this memorandum as to whether the information provided by the applicant is sufficient to determine whether issuance of the proposed import license is recommended and would not constitute an unreasonable risk to public health and safety. If you cannot complete a review and provide such a recommendation within that time frame, or determine that additional information is needed from the applicant, please contact me at (301) 415-1780 or Ms. Janice Owens at (301) 415-3684 at your earliest convenience.

Enclosure:

Appl. Dtd. 05/01/06

IW018 - France

Docket Number 11005628

cc w/enclosure:

J. Schlueter, OSTP

S. Smith, OSTP

S. Flanders, NMSS

R. Whited, NMSS

J. Kennedy, NMSS

D. Cool, NMSS

G. Kim, OGC

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* See previous concurrence

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