

NRC FORM 7  
(6-2006)  
10 CFR 110

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0027

EXPIRES: 06/30/2009

**APPLICATION FOR NRC EXPORT/IMPORT  
LICENSE, AMENDMENT, OR RENEWAL**

(See Instructions on Page 5)

Estimated burden per response to comply with this mandatory collection request: 2.4 hours. This submittal is reviewed to ensure that the applicable statutory, regulatory, and policy considerations are satisfied. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to [infocollects@nrc.gov](mailto:infocollects@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0027), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

PART A. FOR NRC USE ONLY		PUBLIC OR NON-PUBLIC	DATE RECEIVED SEP 7 2006
LICENSE NUMBER FW019	DOCKET NUMBER 11005650	ADAMS ACCESSION NUMBER	

**PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS**  
 (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

1. NAME AND ADDRESS OF APPLICANT/LICENSEE <b>UniTech Services Group, Inc. 295 Parker Street Springfield, MA 01151</b>	1a. NAME OF APPLICANT'S CONTACT <b>Glenn Roberts</b>	1b. APPLICANT'S REFERENCE NUMBER
	1c. PHONE NUMBER <b>610-948-9700, x19</b>	1d. FAX NUMBER <b>610-948-1217</b>
	1e. E-MAIL ADDRESS <b>glenn@ulst.com</b>	
2. TYPE OF NRC LICENSE REQUESTED (Check One)		
<input type="checkbox"/> EXPORT (Parts B, C, E) <input checked="" type="checkbox"/> IMPORT (Parts B, D, E) <input type="checkbox"/> COMBINED EXPORT/IMPORT (Parts B, C, D, E) <input type="checkbox"/> AMENDMENT/RENEWAL Existing License Number:		
3. CONTRACT NUMBER(S)	4. FIRST SHIPMENT DATE <b>November 1, 2006</b>	5. LAST SHIPMENT DATE <b>March 31, 2010</b>
		6. PROPOSED EXPIRATION DATE <b>March 31, 2010</b>

**PART C. TO BE COMPLETED FOR EXPORT ONLY OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS**  
 (If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

7. NAME(S) / ADDRESS(ES) OF SUPPLIERS AND/OR OTHER PARTIES TO THE EXPORT  <b>See Page 3.</b>	8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S)  <b>None.</b>	9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S)  <b>See Page 3.</b>
7a. LIST FUNCTIONS PERFORMED/SERVICE PROVIDED <b>Sorting - See attached detailed explanation.</b>	8a. INTERMEDIATE USE(S) <b>NA</b>	9a. ULTIMATE END USE(S) <b>Determined by customer. Details attached.</b>
10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS  <b>See Pages 3-6.</b>	10a. MAY TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)  <b>See Pages 3-6.</b>	10b. MAX ENRICHMENT OR WGT %  <b>See Pages 3-6.</b>
		10c. MAX ISOTOPE WGT (KG)  <b>See Pages 3-6.</b>
11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)  <b>None known.</b>		

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**APPLICATION FOR NRC EXPORT/IMPORT  
LICENSE, AMENDMENT, OR RENEWAL (Continued)**

LICENSE NUMBER <b>LW019</b>	DOCKET NUMBER <b>11005650</b>	ADAMS ACCESSION NUMBER	<input type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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**PART D. TO BE COMPLETED FOR IMPORT ONLY, OR COMBINED LICENSES, AMENDMENTS, OR RENEWALS**  
(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

12. NAME(S) / ADDRESS(ES) OF FOREIGN SUPPLIERS AND/OR OTHER PARTIES TO IMPORT  <b>See Page 3.</b>	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)  <b>None.</b>	14. NAME(S) / ADDRESS(ES) OF ULTIMATE CONSIGNEE(S)  <b>For import - See item 1. For export - See Page 3.</b>	
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)  <b>Pending</b>	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)  <b>NA</b>	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S) <b>For import - MA DPH 03-5291 For export - See Page 3.</b>	
	13b. INTERMEDIATE USE(S)  <b>NA</b>	14b. INTERMEDIATE USE(S) <b>See attached details.</b>	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES  <b>See Pages 3-6.</b>	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)  <b>See Page 5.</b>	15b. MAX ENRICHMENT OR WGT %  <b>See Page 5.</b>	15c. MAX ISOTOPE WGT (KG)  <b>See Page 5.</b>
	16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) <b>None known.</b>		

**PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, OR RENEWALS**

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <b>6 pages total.</b>	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <b>None required. Activities much less than Appendix P limits.</b>
18. CERTIFICATION: I, the applicant's authorized official, hereby certify that this application is prepared in conformity with Title 10, Code of Federal Regulations, and that all information provided is correct to the best of my knowledge.	
18a. PRINT NAME AND TITLE OF AUTHORIZED OFFICIAL  <b>Glenn Roberts Health Physicist</b>	18b. SIGNATURE - AUTHORIZED OFFICIAL  
18c. DATE  <b>8/17/2006</b>	

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# APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT, OR RENEWAL (Continued)

LICENSE NUMBER <b>EW019</b>	DOCKET NUMBER <b>11005650</b>	ADAMS ACCESSION NUMBER	<input type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

## Supplemental Information for Form 7, Items 7, 9, 12, and 14.

Materials may be received from and returned to any of the following facilities, including contractors working at the sites under the auspices of the referenced licenses. Materials will only be received from and returned to the following Canadian addresses.

- |                                                                                                        |                                                                        |
|--------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------|
| 1) Ontario Power Generation<br>Pickering Nuclear<br>10 Brock Road South<br>Pickering, Ontario, L1V 2R5 | License: PROL - 04.00 (Station A)<br>License: PROL - 08.00 (Station B) |
| 2) Ontario Power Generation<br>Darlington Nuclear<br>Holt Road South<br>Bowmanville, Ontario, L1C 3Z8  | License: PROL - 03.01                                                  |
| 3) Bruce Power, L.P.<br>4th Concession, County Road 20<br>Tiverton, Ontario, CN Nog 270                | License: PROL - 15.00 (Station A)<br>License: PROL - 16.00 (Station B) |

\*Licenses issued by the Canadian Nuclear Safety Commission.

NOTE: Currently, only a pilot program is planned with the Pickering Nuclear Site. If successful, the program is planned to continue.

## Supplemental Information for Form 7, Items 7a., 9a., and 14b. [Ref. 10 CFR §110.32(f)(5) and (7)]

The materials to be imported, processed by way of sorting, and returned to the customer, involve materials that may or may not be radioactively contaminated. The customer has conservatively "quarantined" the materials since they were at one time within the Radiation Control Area (RCA). The materials are suspected of being radioactive until they can be demonstrated otherwise. UniTech will conduct two sorting functions. First, the materials will be sorted by type: paper, cardboard, plastic (and possible subtypes of plastics), metals (ferrous, non-ferrous, and possibly by element or alloy), cloth (and subtypes), rubber, wood, items (respirators, tools, etc.), etc. Second, UniTech may sort items by levels of radioactivity: Non-radioactive/indistinguishable from background, removable versus non-removable contamination, fixed contamination/dose rate, concentrations of radionuclides, etc.

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# APPLICATION FOR NRC EXPORT/IMPORT LICENSE, AMENDMENT, OR RENEWAL (Continued)

LICENSE NUMBER <i>I W 019</i>	DOCKET NUMBER <i>11005650</i>	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

All materials imported from the customer shall be returned to the customer, subsequent to sorting. The materials will not remain in or be disposed of in the United States (US). Once returned to the customer, the customer shall determine if the materials are reusable, recyclable, releasable, or are designated as a non-radioactive or radioactive waste.

Supplemental Information for Form 7, items 10 and 15, including sub-items [Ref 10 CFR §110.32(f)(1) through (6)]

Physical form: Any, primarily solid. No liquids or gases are expected.  
Chemical form: Any.

As to the issue of radioactive waste, the current project considered by UniTech may not require a license to receive and repackage low-level radioactive waste (LLRW). This is because the materials may be reused, recycled, or released as non-radioactive upon return to the customer. A significant portion of the materials may contain no radioactivity. However, due to the perception that the materials may be waste or waste-like, UniTech has decided to request authorization to receive LLRW, rather than importing and exporting the materials under general license provisions. Nevertheless, if the materials were categorized as a radioactive waste, they would meet the radiological criteria to be classified as a Class A waste (10 CFR §61.55). Since all of the materials will be returned to the customer and country of origin, it is not necessary to address agreements with low-level waste compacts or States to accept the materials for disposition or disposal.

Route of transit of shipment: Shipments shall be by highway directly from the Canadian facilities to UniTech in the US, involving typical commercial routes, dependant on weather, traffic and road conditions.

Volume: No more than 30,000 pounds of materials shall be possessed at any one time at UniTech's facility. Typically, this is no more than 5000 cubic feet.

Nuclides and activities: Due to the variability of the potential contaminants of materials, it is difficult to provide an all inclusive list and be confident that an omission has not occurred. For that reason, UniTech is requesting the same broad scope authorizations contained in MA DPH License No. 03-5291. Each shipment, as well as the total quantity, is expected to be a small fraction of the allowable licensed quantities

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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

Radioactive Material	Possession Limits
A. Any radioactive material with atomic numbers 1 through 83, inclusive	0.185 TBq per nuclide, 0.407 TBq total (5 curies per nuclide, 11 curies total)
B. Any Source Material	100 kilograms
C. Any Special Nuclear Material	350 grams of U-235, 200 grams of U-233, and 200 grams of Plutonium
D. Any radioactive material with atomic numbers 84 through 102, inclusive.	0.00037 TBq (10 millicuries)

When any combination of special nuclear material is possessed, possession will be limited such that  $U-235 \text{ grams}/350 + U-233 \text{ grams}/200 + Pu \text{ grams}/200$  shall not exceed unity.

Furthermore, at no time shall materials be imported, possessed, or exported that meet or exceed the quantities specified in 10 CFR §110, Appendix P, Category 2. The foregoing limitation is based on each shipment and materials co-located at the facility under the license. If more than one nuclide is possessed, the sum-of-ratios shall not exceed unity. It should be noted that the MA DPH License Condition 18 requires the same limitation and references NRC letter dated November 14, 2005, "Issuance of Order for Increased Controls For Certain Radioactive Materials Licensees", document number EA-05-090. UniTech has assured the MA DPH that it meets these limitations and requirements.

While not a specific limitation, UniTech provides an example of specific nuclides and quantities that *are not likely to be exceeded* on a per shipment basis. This information is provided on the following page.

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ADDITIONAL INFORMATION (Reference applicable block numbers from page 1 and/or page 2 for each entry)

UniTech - Specific Import/Export License Application  
NRC Form 7 Addendum - August 17, 2006  
Typical Per Shipment Nuclide and Maximum Activity Detail

Nuclide	Symbol	Maximum Activity (1 Bq)	Max. Isotope Wt. (grams)
Silver-110m	Ag-110m	7.39E-07	NA
Cerium-141	Ce-141	1.22E-05	NA
Cerium-144	Ce-144	8.21E-05	NA
Cobalt-58	Co-58	1.28E-06	NA
Cobalt-60	Co-60	1.68E-04	NA
Chromium-51	Cr-51	4.68E-05	NA
Cesium-134	Cs-134	1.61E-06	NA
Cesium-137	Cs-137	2.41E-05	NA
Europium-154	Eu-154	4.03E-07	NA
Europium-155	Eu-155	4.03E-07	NA
Iron-55	Fe-55	5.31E-06	NA
Iron-59	Fe-59	9.68E-06	NA
Hafnium-181	Hf-181	4.70E-07	NA
Hydrogen-3	H-3	3.70E-03	NA
Iodine-131	I-131	3.67E-05	NA
Lanthinum	La-140	5.51E-06	NA
Barium-140	Ba-140	2.75E-06	NA
Manganese-54	Mn-54	7.59E-06	NA
Molybdenum-99	Mo-99	2.02E-07	NA
Niobium-94	Nb-94	6.72E-07	NA
Niobium-95	Nb-95	2.07E-04	NA
Neptunium-239	Np-239	2.96E-06	NA
Ruthenium-103	Ru-103	4.69E-05	NA
Ruthenium-106	Ru-106	1.29E-04	NA
Antimony-124	Sb-124	3.33E-05	NA
Antimony-125	Sb-125	1.25E-05	NA
Scandium-46	Sc-46	2.69E-07	NA
Tin-113	Sn-113	3.56E-06	NA
Strontium-90	Sr-90	8.84E-05	NA
Zinc-65	Zn-65	3.56E-06	NA
Zirconium-95	Zr-95	1.33E-04	NA
Americium-241	Am-241	8.06E-07	NA
Curium-242	Cm-242	1.34E-07	NA
Curium-244	Cm-244	9.41E-07	NA
Pu-238	Pu-238	4.03E-07	6.4 E-07
Pu-239/40	Pu-239+240	1.81E-06	7.9 E-04
Maximum Total Activity		4.77E-03	7.9 E-04

NOTES: Isotope and Element Weight are identical for Plutonium  
Weight % (NRC Form 7 Item 19) is "NA" for Plutonium  
Typical, H-3 activities are 2-5% of the maximum indicated.

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A SUBSIDIARY OF UNIFIRST CORPORATION

August 17, 2006

Mr. Stephen Dembek, Section Chief  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Washington, D.C. 20555-0001

Re: Application for Specific Import / Export License

Dear Mr. Dembek:

Enclosed is a complete application for a specific import/export license for Canada. UniTech has recently submitted an amendment request to the Massachusetts Department of Public Health (MA DPH) to enable the receipt and processing of the materials covered by this specific license request. Due to time constraints, it is necessary to begin the import/export license process. UniTech shall not receive such material until the MA DPH has issued the amended materials license as well.

For conservatism, UniTech is applying for a specific license to import and export waste even though none of the material in question will be so designated until after it is returned to its place of origin. UniTech is merely sorting and classifying the material, some of which will be reused or recycled; however, because the material would likely be discarded if sorting were not possible, it is apt to have the character and appearance of waste when imported into the United States.

Enclosed is the application fee of \$8100. UniTech appreciates any expedited attention that may be devoted to this request. Please contact me if you have questions. I may be contacted directly at 610-948-9700, extension 19, or by email at [glenn@ulst.com](mailto:glenn@ulst.com).

Sincerely,

UniTech Services Group, Inc.

A handwritten signature in black ink, appearing to read "Glenn Roberts".

Glenn Roberts  
Health Physicist

cc: Ken Traedger, Massachusetts Department of Public Health  
Michael R. Fuller, Esq., Manager, Health Physics and Engineering  
Charles R. Carroll, Plant Manager/RSO

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