


NRC FORM 7 (02-2016) 10 CFR 110		 U. S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0027 <small>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 FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@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.</small>		EXPIRES: 11/30/2018	
APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) <i>(See Instructions on Pages 4 and 5)</i>							
PART A. FOR NRC USE ONLY		<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC		DATE RECEIVED <div style="font-size: 1.2em; font-weight: bold;">OCT 27 2016</div> <div style="font-size: 0.8em;">SF</div>			
LICENSE NUMBER <div style="font-size: 1.2em; font-weight: bold;">XW023</div>		DOCKET NUMBER <div style="font-size: 1.2em; font-weight: bold;">11006249</div>		ADAMS ACCESSION NUMBER			
PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS (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 UniTech Services Group, Inc. 138 Longmeadow Road Suite 202 Longmeadow, MA 01106 413-543-6911		1a. NAME OF APPLICANT'S CONTACT Glenn Roberts 1c. PHONE NUMBER (413) 382-7350 1e. E-MAIL ADDRESS GRoberts@UniTechUS.com		1b. APPLICANT'S REFERENCE NUMBER EX-2016-01 1d. FAX NUMBER (413) 543-6989			
2. TYPE OF ACTION REQUESTED (Check One)							
<input checked="" type="checkbox"/> EXPORT (Parts B, C, E)		<input type="checkbox"/> IMPORT (Parts B, D, E)		<input type="checkbox"/> AMENDMENT/RENEWAL Current License Number:		<input type="checkbox"/> CONSENT REQUEST (Parts B, C) Current License Number:	
3. CONTRACT NUMBER(S) NA		4. FIRST SHIPMENT DATE 01/02/2017		5. LAST SHIPMENT DATE 12/31/2025		6. PROPOSED EXPIRATION DATE 12/31/2025	
PART C. TO BE COMPLETED FOR EXPORT 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 UniTech Services Group Inc. Oak Ridge Service Center 2323 Zirconium Road Oak Ridge, TN 37830 TDEC License: R-M3007 See additional information on Page 3.		8. NAME(S) / ADDRESS(ES) OF INTERMEDIATE FOREIGN CONSIGNEE(S) See discussion on Page 3.		9. NAME(S) / ADDRESS(ES) OF ULTIMATE FOREIGN CONSIGNEE(S) The information in this item contains confidential customer names and is proprietary in nature. The information should be withheld from public disclosure. See information on Page 3.			
7a. FUNCTION(S) PERFORMED/SERVICE(S) PROVIDED See information on Page 3.		8a. INTERMEDIATE USE(S)		9a. ULTIMATE END USE(S) See additional information on Page 3			
10. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES, EQUIPMENT, OR COMPONENTS, FOR NUCLEAR EQUIPMENT INCLUDE TOTAL DOLLAR VALUE OF EQUIPMENT FOR EXPORT Materials not amenable to decontamination, release for unrestricted release for beneficial reuse or conditional release, imported under NRC Import License (submitted coincident with this application, Applicant Reference Number "IM-2016-01").		10a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq) 10,000 metric tons. Additional detail attached. Materials will be solid, metallic oxides, and other chemical forms.		10b. MAX ENRICHMENT OR WGT % Not to exceed 5%.		10c. MAX ISOTOPE WGT (KG) Not to exceed 15 grams U-235 per shipment. U-233 / plutonium shall be incidental; i.e., micrograms per shipment, if any.	
11. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME) Canada, 100%. Although, SNM is likely incidental as commercial Canadian power reactors operate on natural uranium.							

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U. S. NUCLEAR REGULATORY COMMISSION


**APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)**

LICENSE NUMBER XW023	DOCKET NUMBER 11006249	ADAMS ACCESSION NUMBER	<input checked="" type="checkbox"/> PUBLIC OR <input type="checkbox"/> NON-PUBLIC
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PART D. TO BE COMPLETED FOR IMPORT 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	13. NAME(S) / ADDRESS(ES) OF INTERMEDIATE CONSIGNEE(S)	14. NAME(S) / ADDRESS(ES) OF ULTIMATE U. S. CONSIGNEE(S)	
12a. NRC EXPORT LICENSE NUMBER(S) (if applicable)	13a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	14a. LICENSE NUMBER(S) / EXPIRATION DATE(S)	
	13b. INTERMEDIATE USE(S)	14b. ULTIMATE END USE(S)	
15. DESCRIPTION OF RADIOACTIVE MATERIALS, SEALED SOURCES, NUCLEAR FACILITIES	15a. MAX TOTAL VOLUME / ELEMENT WGT (KG), OR TOTAL ACTIVITY (TBq)	15b. MAX ENRICHMENT OR WGT %	15c. MAX ISOTOPE WGT (KG)
	16. FOREIGN OBLIGATIONS (BY COUNTRY AND BY PERCENTAGE OF MAXIMUM TOTAL VOLUME)		

PART E. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS OR CONSENT REQUEST(S)

17. ADDITIONAL INFORMATION PROVIDED ON PAGES 3, 4, AND/OR ON SEPARATE SHEETS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	17a. COPIES OF RECIPIENTS' AUTHORIZATIONS PROVIDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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 Glenn Roberts Corporate Health Physicist	18b. SIGNATURE - AUTHORIZED OFFICIAL 
18c. DATE 20 OCT 2016.	

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U. S. NUCLEAR REGULATORY COMMISSION

APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) (Continued)

LICENSE NUMBER XW023	DOCKET NUMBER 11000249	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)

Items 7/8 - Discussion: Materials in the course of services provided pursuant to import license (submitted concurrently with this export application, Applicant Ref. No. IM-2016-01) initially may be received at any of the following, transferred between any of the following, and may be combined for return shipment at any of the following. UniTech has an inherent interest in minimizing such transfers.

- 1) UniTech, Oak Ridge, TN (listed on Page 1, above)
- 2) Toxco Materials Management Center, 109 Flint Road, Oak Ridge, TN 37830 TDEC License R-01037-E16
- 3) UniTech Services Group, Inc., 1006 Third Avenue, Morris, IL 60450 IEMA License IL-01008-01
- 4) UniTech Services Group, Inc. 402 North Third Avenue, Royersford, PA PaDEP License PA-1073

NOTE: UniTech's Royersford facility is not currently licensed to receive radioactive waste; an amendment or new license is pending. Accordingly, Royersford shall not receive waste until licensed by PaDEP. All operations shall be conducted in full compliance with current licenses.

Item 9.

NOTE: THE FOLLOWING LIST OF UNITECH'S CUSTOMERS IS PROPRIETARY AND SHOULD BE WITHHELD FROM PUBLIC DISCLOSURE.

[REDACTED]

9.a. Recipients may reuse, store, transfer, or dispose of materials in accordance with their CNSC Licence.

Item 10. Quantities of radioactive material shall not exceed those specified in the accompanying Import Application, Applicant Reference Number IM-2016-01.



AFFIDAVIT

20 October 2016

c/o Andrea Jones, Health Physicist, License Reviewer
Deputy Director, Office of International Program
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Re: Request for Special Handling of Proprietary Information Pursuant to 10 CFR 2.390 of
Customer Information Contained in UniTech's License Applications dated 20 October 2016

- NRC Form 7, Import License, Applicant's Reference Number IM-2016-01
- NRC Form 7, Export License, Applicant's Reference Number EX-2016-01

Dear Ms. Jones:

In accordance with the provisions of 10 CFR 2.390, UniTech respectfully requests that the following information be withheld from public disclosure, including availability to the public while in the public document room and through Freedom of Information Act (FOIA) requests. The basis for this request is provided in 10 CFR 2.390(a)(4) because the information contains confidential and proprietary trade secrets, commercial or financial information. As required by paragraph (b)(1)(iii), the criteria contained in (b)(4) is specifically addressed and respectively numbered as follows:

- i) Information is proprietary commercial property and has been held in confidence by UniTech and all parties and agents involved by executing written confidentiality agreements.
- ii) The information, notably sensitive and specific customer names and addresses, is normally held in confidence by UniTech, the rationale being stated in iv) and v) below.
- iii) By way of this affidavit, the information is transmitted to and received by the Commission in confidence.
- iv) The information cited is not available in public sources and is of unique and proprietary nature.
- v) Public disclosure of the information is likely to cause substantial harm to the competitive position of UniTech. The acquisition of this information represents a substantial financial investment and has required hundreds of person-hours of effort over several years time. The results of these efforts are unique and vital to the continuing competitive position of the company. Public disclosure of the information would provide an economic windfall to competitors, who are either unable or unwilling to invest in such effort, and who would gain the benefits of the company's expenditures at no cost. The results of the company's investment in time, personnel and material resources cannot be easily duplicated without substantial like efforts and expenditures. Additionally, disclosure would likely limit the ability of UniTech to recover its investment in this proprietary information.

OCT 27 2016

Rec'd
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UniTech has considered providing the information to be held as proprietary in a separate document as suggested by (b)(1)(iii). However, UniTech believes that this method would detract from the readability and cohesiveness of the document due to the relationship of general statements and proprietary statements within the context of a single subject or section. For this reason, and in order to facilitate regulatory identification, UniTech will clearly identify proprietary information in the following manner:

- 1) The top of each page is marked "PROPRIETARY VERSION" and initialed by signer.
- 2) Immediately preceding the proprietary content, a conspicuous caption appears: "NOTE: THE FOLLOWING LIST OF UNITECH'S CUSTOMERS IS PROPRIETARY AND SHOULD BE WITHHELD FROM PUBLIC DISCLOSURE".

The following information dated 20 October 2016 and submitted with this affidavit is proprietary and should be withheld from public disclosure:

- 1) The list of customers and customer addresses appearing in Item 12 on page 3 of UniTech's Import Application, Reference Number IM-2016-01.
- 2) The list of customers and customer addresses appearing in Item 9 on page 3 of UniTech's Export Application, Reference Number EX-2016-01.

A REDACTED version of both applications has been provided to facilitate NRC's processing. Two originals of this Affidavit are provided; one for each application.

Please contact me at your earliest opportunity should you have any questions. Thank you for your assistance and consideration in this matter.

Sincerely,

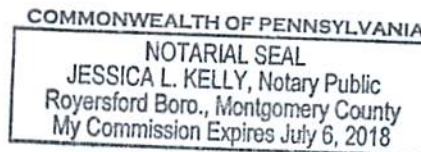
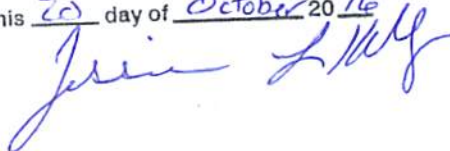
UniTech Services Group, Inc.



Glenn Roberts
Corporate Health Physicist

cc: File

Sworn to and subscribed before me
this 20 day of October 20 16



OCT 27 2016 *Rec'd*

From: [Glenn E. Roberts](#)
To: [Jones, Andrea](#)
Cc: [Michael R. Fuller](#)
Subject: [External_Sender] UniTech - Pending Waste Import Application
Date: Tuesday, December 20, 2016 8:26:16 PM

Dear Ms. Jones,

Pursuant to our earlier phone conversation, UniTech provides the following information. We believe that this information resolves the concerns expressed and obviates the need for resubmission. We respectfully request your consideration in this regard.

The quoted sentences below are directly from the middle of page 3 of our import application. Information without quotes has been added for explanatory purposes.

“Imported Materials may be received along with routine shipments (e.g., laundry imported under general license) or in separate dedicated conveyances.” UniTech has been a principal in discussions with NRC going back 16 years regarding laundry being conducted under general license pursuant 10 CFR Part 110. It is not our intent to include laundry and decontamination of protective clothing and related products in this specific import license. The forgoing sentence merely indicates that the materials subject to this specific license request may be transported along with laundry.

“The requested processes include sorting and repackaging of waste and offers benefits to our customers and the public.” [Emphasis added.] Included in the description in Block 15, materials may include bags of conventional waste from the customers comprised of paper, cardboard, plastic, cloth, and miscellaneous debris.

“Valuable items and materials will be recovered. Recovered materials may be routed for additional processing (not necessarily subject to the requirements of a specific NRC Import License): e.g., conventional laundry, respirator processing, or Tool and Material Decontamination (TMD).” The foregoing sentence explains that materials retrieved from the waste may be subject to processes that would be subject to general license. That does not excuse that fact that they are being sent as waste to be processed as waste.

“Materials that can be released for unrestricted use may [be] reused or recycled (i.e, beneficial reuse). Materials that cannot be released for unrestricted use may be conditionally released in accordance with the Tennessee facility licenses.” Again, materials subject to this specific license application are classified as waste at the time they are imported. Given that UniTech’s processes are effective to render the materials suitable for release and beneficial reuse does not redefine them as non-waste materials at the time they were imported.

Further, some imported materials may be known to require return to the customer as waste but require mechanical separation during UniTech’s processing.

There are two example exclusions to the definition of radioactive waste that we would wish to discuss.

- “(2) A contaminant on any non-radioactive material (including service tools and protective clothing) used in a nuclear facility (an NRC- or Agreement State-licensed facility (or equivalent facility) or activity authorized to possess or use radioactive material), if the material is being shipped solely for recovery and beneficial reuse of the non-radioactive material in a nuclear facility and not for waste management purposes or disposal;” and
- (6) Imported solely for the purposes of recycling and not for waste management or disposal where there is a market for the recycled material and evidence of a contract or business agreement can be produced upon request by the NRC.

Exclusion (2) does not apply to those materials that are not intended for reuse in a nuclear facility. The majority of the subject imported waste is not intended for reuse in a nuclear facility.

Exclusion (6) does not apply because materials are being imported for waste management or disposal. Given that UniTech may release and recycle some of the materials does not support the *a posteriori* reclassification of them after the fact.

UniTech asserts that it would be inappropriate to not include unrestricted release and beneficial reuse in NRC Form 7 items 13.b and 14.b. Those terms accurately convey what is being done to the materials imported as waste and classified as waste at the time of import. Customers may ship the materials because they have no further use (the classical definition of waste), and they are not necessarily interested in the means UniTech employs to disposition them. UniTech believes, as a first option, materials should be processed as necessary for beneficial reuse if economically feasible to do so. It is important that we note that the licensed conditional release process involves a volumetric assay of materials, most often not suitable for surface assay, and disposition in a manner that is classified neither as recycling nor as beneficial reuse.

A concise statement of the end use would be “Categorization and processing of waste materials as appropriate based on their physical and radiological conditions. All materials that would require transfer to a land disposal facility subject to 10 CFR Part 61 shall be returned to Canada under the associated export license XW023.”

Finally, we affirm that only materials that require a specific waste import license shall be subject to this request and the specific license shall not be utilized for any materials acceptable for import under general license. Upon consideration of the information herein, if the NRC feels that none of the requested activities require a specific license, we would welcome the NRC’s written confirmation in that regard.

Kind regards,
Glenn

Glenn Roberts
Corporate Health Physicist
(413) 382-7350
GRoberts@UniTechUS.com

From: Jones, Andrea [<mailto:Andrea.Jones2@nrc.gov>]

Sent: Tuesday, December 20, 2016 10:39 AM

To: Glenn E. Roberts <groberts@unitechus.com>

Subject: FRN for Export back to Canada