

NRC FORM 7
(07-2019)
10 CFR 110



U. S. NUCLEAR REGULATORY COMMISSION

**APPLICATION FOR NRC EXPORT OR IMPORT
LICENSE, AMENDMENT, RENEWAL,
OR CONSENT REQUEST(S)**
(See Instructions on Pages 4 and 5)

APPROVED BY OMB: NO. 3150-0027

EXPIRES: 02/28/2022

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 Information Services Branch (T-6 A10M), 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.

PART A. FOR NRC USE ONLY		<input checked="" type="checkbox"/> Public OR <input type="checkbox"/> Non-Public		Date Received 05/04/20 JMS	
License Number XMAT455		Docket Number 11006378		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 Cambridge Isotope Laboratories 50 Frontage Road Andover, MA. 01810		1a. Name of Applicant's Contact Rebecca Dabkowski		1b. Applicant's Reference Number	
		1c. Office Telephone Number 978-749-8000		1d. Office Facsimile Telephone Number 978-749-2768	
		1e. Applicant's E-mail Address rdabkowski@isotope.com			
2. Type of Action Requested (Check one)		<input checked="" type="checkbox"/> Export (Parts B, C, E) <input type="checkbox"/> Amendment/Renewal <input type="checkbox"/> Consent Request (Parts B, C)			
		<input type="checkbox"/> Import (Parts B, D, E) <input type="checkbox"/> Current License Number:			
3. Contract Number(s)		4. First Shipment Date 06/01/2020		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 U. S. Suppliers and/or other U. S. Parties to the Export Cambridge Isotope Laboratories, Inc. 6 Highwood Drive Tewksbury, MA 01876 Cambridge Isotope Separations 1689 Burnett Drive Xenia, OH 45385		8. Name(s)/Address(es) of Intermediate Foreign Consignee(s) See Page 3		9. Name(s)/Address(es) of Ultimate Foreign Consignee(s) See Page 3	
7a. Function(s) Performed/Service(s) Provided Supplier		8a. Intermediate Use(s) Distribution		9a. Ultimate End Use(s) Production of Active Pharmaceutical Ingredients (APIs)	
10. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities, Equipment, or Components; for Nuclear Equipment include Total Dollar Value of Equipment for Export Non-radioactive, Deuterium oxide		10a. Maximum Total Volume/Element WGT (KG), or Total Activity (TBq)		10b. Max Enrichment or WGT% 99.99%	
				10c. Max Isotope WGT (KG) N/A, Non-radioactive material, Not radioactive waste.	
11. Foreign origin (or obligations by country and, if known, by percentage of maximum total volume)					

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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 Foreign Parties to Import	13. Name(s)/Address(es) of Foreign or U. S. 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. Maximum 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)

(If more space is needed to complete any of the items, use Pages 3-4 first, and then attach additional sheets, if necessary.)

17. Additional Information provided on pages 3, 4, and/or separate sheets? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	17a. Copies of Recipient's Authorizations Provided? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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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 Rebecca Dabkowski Trade Compliance Officer	18b. Signature -- Authorized Official Rebecca Dabkowski <small>Digitally signed by Rebecca Dabkowski DN: cn=Rebecca Dabkowski, o=Cambridge Isotope Laboratories, ou=Trade Compliance Officer, email=rdabkowski@isotope.com, c=US Date: 2020.04.24 11:13:50 -04'00'</small>	18c. Date 04/24/2020
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Public

OR



Non-Public

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

NRC Form 7 Block 8: Intermediate Consignee:

NRC Form 7 Block 9: End Users



Cambridge Isotope Laboratories, Inc.

April 23, 2020

Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Affidavit for exclusion of information per 10 CFR 2.390

Dear Deputy Director,

As the Trade Compliance Manager for Cambridge Isotope Laboratories (CIL), I am the person responsible for evaluating the proprietary information contained within our specific license application. On behalf of Cambridge Isotope Laboratories, I respectfully request to have proprietary supply chain information withheld from our license application for our exports to India.

The information sought to be withheld pursuant to the provisions of 10 CFR 2.390(a)(4) is the customer information including the intermediate consignee/distributor located in boxes 7-9 of NRC form 7, as well as the supplementary information provided from the customer. CIL is providing our customer and distribution network details with our specific license application and views this data as proprietary commercial information. The customer's letter with supplementary information is also deemed proprietary information and should be withheld from public view.

The list of customers should be held in confidence by the NRC based on 10 CFR 2.390(b)(4) because:

- a) This information is being transmitted to the NRC voluntarily and in confidence.
- b) This information is, and has been, held in confidence by CIL and is not available in the public domain.
- c) This information is of a type that is customarily held in confidence by CIL because this information, if released, might result in the loss of competitive advantage, since it reveals our distribution network, as well as our end users for our products.
- d) Public disclosure of this information is likely to cause substantial harm to the competitive position of CIL, because similar products are manufactured and sold by our competitors. CIL has expended considerable time and money to have a leading position in this specialized market including developing new commercial markets, securing our supply chain, perfecting processes to produce this product, building our global customer base, and complying with all regulations for export of this product.
- e) Access to this information would mean an unfair advantage to our competition. Competitors with this information would be allowed to circumvent the expense and time for developing such business leads and market presence, which in turn undermines CIL's business and leading market position.

Accordingly, we respectfully request the designated information be withheld from public disclosure for the reasons stated above.

Executed on April 23, 2020

Rebecca Dabkowski
Trade Compliance Officer
Cambridge Isotope Laboratories