

NRC FORM 7 (09-29-2022) 10 CFR 110		U. S. NUCLEAR REGULATORY COMMISSION APPLICATION FOR NRC EXPORT OR IMPORT LICENSE, AMENDMENT, RENEWAL, OR CONSENT REQUEST(S) <i>(See Instructions on Pages 4 and 5)</i>		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, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollections.Resource@nrc.gov, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0027), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; email: oir-a_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.</small>		EXPIRES: 05/31/2025	
PART A. FOR NRC USE ONLY		<input checked="" type="checkbox"/> Public OR <input type="checkbox"/> Non-Public		Date Received 01/03/2023 AB			
License Number XW031		Docket Number 11006549		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 Eastern Technologies, Inc. 215 2nd Avenue Ashford, Alabama 36312				1a. Name of Applicant's Contact Mark Fellows		1b. Applicant's Reference Number	
				1c. Office Telephone Number 334-899-4351		1d. Office Facsimile Telephone Number 334-899-2310	
				1e. Applicant's E-mail Address mfellows@gri-eti.com			
2. Type of Action Requested		<input checked="" type="checkbox"/> Export (Parts B, C, E) <input type="checkbox"/> Amendment/Renewal Current License Number:		<input type="checkbox"/> Import (Parts B, D, E) <input type="checkbox"/> Consent Request (Parts B, C) Current License Number:			
3. Contract Number(s) N/A				4. First Shipment Date June 2023		5. Last Shipment Date June 2028	
				6. Proposed Expiration Date 12-31-2028			
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 Eastern Technologies, Inc. 215 2nd Avenue Ashford, Alabama 36312 There are no additional US parties to the Export				8. Name(s)/Address(es) of Intermediate Foreign Consignee(s) There are no intermediate Foreign Consignee(s)		9. Name(s)/Address(es) of Ultimate Foreign Consignee(s) Barakah Nuclear Power Plant ATTN: Nawah Logistics Team Barakah Al Dhafra Region Emirate of Abu Dhabi United Arab Emirates	
7a. Function(s) Performed/Service(s) Provided Dissolve & Decontaminate				8a. Intermediate Use(s) None		Return secondary residual material to the generator of the material.	
10. Description of Radioactive Materials, Sealed Sources, Nuclear Facilities, Equipment, or Components; for Nuclear Equipment include Total Dollar Value of Equipment for Export The used, contaminated dissolvable protective clothing and related items will be transported to ETI for processing in 40 ft sealand containers (or 2 20 ft containers). Typically such a container of material will have a total activity ranging from less than one (1) millicurie to one-hundred millicuries of mixed corrosion activation products and mixed fission products. The total activity present on any given (continued on page 3)				10a. Maximum Total Volume/Element WGT (KG), or Total Activity (TBq) 0.000037 Tbq (1 millicurie) to 0.0037 Tbq (100 millicuries) per shipment. 1 to 2 shipments per year		10b. Max Enrichment or WGT% N/A	
						10c. Max Isotope WGT (KG) N/A	
11. Foreign origin or obligations by country and, if known, by percentage of maximum total volume (leave blank for byproduct licenses) N/A							

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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

XW031

Docket Number

11006549

Adams Accession Number



Public

OR



Non-Public

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?



Yes



No

17a. Copies of Recipient's Authorizations Provided?



Yes



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

MARK FELLOWS

18b. Signature -- Authorized Official

Mark Fellows

18c. Date

11-28-22

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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 XW031	Docket Number 11006549	Adams Accession Number	<input checked="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)

(continued from page 1, item 10)

shipment is dependent on the amount of contamination present on the clothing. The activation products, such as Co-60, Co-58, and Mn-54, typically comprise the predominant radionuclides. The used protective clothing and related products are typically fabricated from polyvinyl alcohol. The radioactive contaminants are typically in the form of small, solid particulate metal oxides.

Following is a description of the shipping route. The material will be loaded at the ETI facility in Ashford, AL. It will be picked up and transported to a US port, which would most likely be Savannah or Mobile. Then the container will be shipped by Ocean to a port in the UAE, which would most likely be Abu Dhabi. Then the container would be transported by truck to the Barakah NPP. 1 to 2 shipments per year are anticipated. Shipments will be scheduled at mutually agreeable dates and will occur from 2023 to 2028,

The total amount of radioactivity that can be received at the ETI facility per the facility license issued by the State of Alabama is 0.0925 Tbq (2.5 Curies) for isotopes with atomic number 1 to 83, and 0.00074 Tbq (20 millicuries) for isotopes with atomic number 84 to 101 (except source or special nuclear material). The facility limits on total activity applies to material received from all sources. ETI currently receives similar material from about 50% of the commercial nuclear power plant sites in the US and manages the material to stay well below the limits on total activity. The material to be imported from the UAE (Barakah NPP) will not add appreciably to the total amount of radioactive materials currently managed at the ETI facility at any given time.

Waste Classification, as defined in 10CFR51.55, is not applicable to this export license since the dissolved and decontaminated radioactive material is returned to the original generator in the UAE and will not be disposed of in the USA. Although waste classification does not apply, the radioactive material managed under this export license would be classified as Class A.



November 10, 2022

Deputy Director
Office of International Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-001

RE: Application for License to export Radioactive Material.

Dear Deputy Director:

Pursuant to 10 CFR Part 110, Paragraph 110.31, I am writing you to submit our application for a license to export radioactive material. My company, Eastern Technologies, Inc., has entered into commercial agreements with the Barakah Nuclear Power Plant in the United Arab Emirates (UAE) to provide dissolvable protective clothing and related products made from polyvinyl alcohol (PVA) and associated dissolving and decontamination services. Following use, the radioactively contaminated dissolvable products will be imported from the UAE for processing at our facility in Ashford, Alabama. The ETI facility is licensed by the State of Alabama (Radioactive Material License No. 947). This license authorizes the dissolving and decontamination of PVA dissolvable clothing and related products. Please note that ETI provides the same processing services to about 50% of the US commercial nuclear power market at our Ashford, Alabama facility.

Possessing the ability to export radioactive material to Barakah is critical to meeting our business commitments with Barakah. Your prompt attention to this matter is appreciated.

A completed NRC Form 7 for the export license application is enclosed with this letter. If you have any questions or require additional information, please contact Mr. Doug Kay our company technical contact for this project, at 871-559-0506 or dkay@orex.com. You may also contact me at 334-899-4351 or mfellows@gri-eti.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Fellows", is written over a horizontal line.

Mark Fellows
Vice-President
Eastern Technologies, Inc.
215 2nd Ave
Ashford, AL 36312

Eastern Technologies, Inc.
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