

ENERGYSOLUTIONS

February 21, 2012

CD12-0045

Mr. Tremaine Donnell
NRC Clearance Officer
Mail Stop T-5 F53
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Request for Comments on Renewing Information Collection Provisions of Form 7, 77 FR 6827

Dear Mr. Donnell:

The purpose of this letter is to provide comments in response to the Nuclear Regulatory Commission (NRC) solicitation of comments regarding the forthcoming NRC request to the OMB for approval for renewal of the information collection provisions of NRC Form 7, "Application for NRC Export or Import License, Amendment, Renewal or Consent Request(s)."

Among other questions in the February 9, 2012 *Federal Register* notice, the NRC asks, "Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?" Generally, EnergySolutions does not take issue with the subject matter and utility of the information associated with Form 7. However, EnergySolutions does question the instruction for Block 10 which requires a description of the material to be imported. Specially, the instruction provides:

... For radioactive waste, identify and provide maximum total volume in kilograms for each non-radioactive material involved, and physical and chemical forms for each radioactive material, along with the overall waste classification (see 10 CFR 61.55) if exported for direct disposal at a Part 61 or equivalent Agreement State licensed facility; route(s) or transit, forms of management and ultimate disposition. ... (emphasis added).

It is not clear why the underlined language is included. We know of no case when a person within the United States would be exporting radioactive material for purposes of direct disposal to a disposal site subject to 10 CFR Part 61 or an equivalent Agreement State site as such sites are all within the United States. Therefore, we propose that this language be deleted.

If you have any questions regarding these comments, please contact me at (240) 565-6148 or temagette@energysolutions.com.

Sincerely,



Thomas E. Magette, P.E.
Senior Vice President
Nuclear Regulatory Strategy

cc: Margaret Doane, OIP

to a facility
in a foreign country
that would be analogous to