NRC Export/Import Licensing
10 CFR Part 110

Lauren Mayros
International Policy Analyst
Export Controls and Nonproliferation Branch
Office of International Programs

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Legal Basis:

- Atomic Energy Act of 1954
- Nuclear Non-Proliferation Act of 1978
- Treaties, Conventions and Agreements

Exports: reactors; fuel cycle facilities; components; nuclear grade graphite for nuclear end use; deuterium; source, special nuclear and byproduct materials including when contained in spent fuel or radioactive waste

Imports: reactors; fuel cycle facilities; source, special nuclear and byproduct materials including when contained in spent fuel or radioactive waste
All exports and imports of NRC–controlled commodities (materials and equipment) must be authorized by either:

- An NRC **general** export or import license or
- An NRC **specific** export or import license or
- An exemption from NRC requirements for a specific or a general license which may be granted in response to an application requesting an exemption or issued on NRC’s initiative.
# NRC Form 7

**PART A. FOR NRC USE ONLY**

- [ ] Original
- [ ] Revision

**PART B. TO BE COMPLETED FOR ALL LICENSES, AMENDMENTS, RENEWALS, OR CONSENT REQUESTS**

- [ ] Type of action requested:
  - [ ] Export
  - [ ] Import
  - [ ] Consent Request

**PART C. TO BE COMPLETED FOR EXPORT LICENSES, AMENDMENTS, OR RENEWALS**

- [ ] Generic Radiation Source License
- [ ] Radiation Device License
- [ ] Other license type

**PART D. TO BE COMPLETED FOR IMPORT LICENSES, AMENDMENTS, OR RENEWALS**

- [ ] Importer's name
- [ ] Holder of the license
- [ ] Date of request

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

- [ ] Applicant's address
- [ ] Applicant's signature
- [ ] Date

**16. CERTIFICATION**

The application is prepared in conformity with 10 CFR 2.401.
Application may be sent through regular mail, but not advisable.
Review process does not start, until full fee is received.
A succinct cover letter or email explaining application is helpful.
If needed, you may contact NRC licensing staff early, for clarity with information needed for license application.
Pay special attention to listing obligations for material and equipment (e.g. EURATOM, Canada, Australia, and the United States).
Be cognizant of and accurately reflect the information requested in the blocks.
Include specific and accurate information for intermediate and end use(s). Block 13

Be realistic about expiration date requested.

Describe accurately and succinctly, the equipment, sealed source, or radioactive material to be exported – especially enrichment levels, weight quantity, and minor components.
Agreement for Cooperation (123 Agreement)

Full-scope IAEA safeguards in recipient non-nuclear weapon states (NNWS)

USG must obtain assurances from the foreign government on case-by-case basis that material or equipment will be made subject to 123 Agreement with respect to:

- No nuclear explosive use or R&D on any nuclear explosive device
- Adequate physical security will be maintained
- No retransfer or alteration in form (reprocessing) without prior USG consent

Not inimical to common defense and security

For XR, not an unreasonable risk to the public health and safety of the U.S.
USG must obtain assurances from the foreign government on case–by–case basis that:

- IAEA (full–scope) safeguards will apply in NNWS
- No nuclear explosive use or R&D on such device
- No retransfer without prior USG consent

Not inimical to common defense and security
Illustrative Lists in Part 110 Appendices

- Appendix A – Nuclear Reactor Equipment
- Appendix B – Gas Centrifuge Enrichment
- Appendix C – Gaseous Diffusion Enrichment
- Appendix D – Aerodynamic Enrichment
- Appendix E – Chemical or Ion Exchange Enrichment
- Appendix F – Laser-Based Enrichment
- Appendix G – Plasma Separation Enrichment
- Appendix H – Electromagnetic Enrichment
- Appendix I – Reprocessing
- Appendix J – Uranium Conversion
- Appendix K – Plants for the Production of Heavy Water, Deuterium and Deuterium Compounds
- Appendix N – Lithium Isotope Separation
- Appendix O – Fuel Fabrication
Nuclear Reactors & Especially Designed or Prepared Equipment
Especially Designed or Prepared Equipment

Definition of “Nuclear Reactor:”

- Items within or attached directly to the reactor vessel
- Equipment which controls the level of power in the core
- Components which normally contain or come in direct with or control the primary coolant of the reactor core
In 2005, Part 110 was amended to address the IAEA Code of Conduct on the Safety and Security of Radioactive Sources and its Import/Export Guidance.

16 radionuclides previously authorized for export or import under general license became subject to specific licensing.

In 2010, Part 110 was amended to allow U.S. parties to import under general license if they are appropriately authorized domestically.
If a device or a source for use in a device contains Appendix P radionuclides (Am–241, Am–241/Be, Cf–252, Cm–244, Co–60, Cs–137, Gd–153, Ir–192, Pu–238, Pu–239/Be, Pm–147, Ra–226, Se–75, Sr–90, Tm–170 or Yb–169) a specific NRC export license may be required.
To contact the NRC Office of International Programs

301-415-1780

THANK YOU!!!

Lauren Mayros
301-415-2775
Lauren.Mayros@nrc.gov