

Current LLW Regulatory Challenges

Larry W. Camper
Director

Division of Waste Management and Environmental Protection
U.S. Nuclear Regulatory Commission

Issues

- Strategic Assessment
- Class B/C Waste Disposal
- Concentration Averaging
- LLW Blending
- Depleted Uranium
- Decommissioning Planning Rule

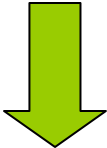
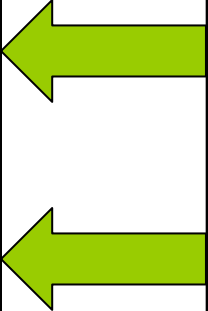
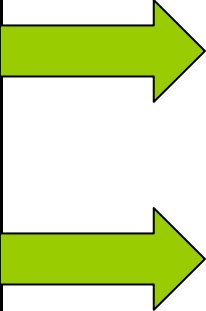
NRC LLW Program

External

- Congress
- GAO
- NAS
- Industry
- States
- International
- Other

Internal

- Commission
- ACNW&M
- Other NRC Programs



Action Needed



LLW Strategic Assessment

Purpose



- Position the LLW program to meet current and future challenges
 - Ensure safe and secure disposal
 - Promote reliable, stable, and adaptable regulatory framework
 - Address gaps/vulnerabilities
 - Improve efficiency and effectiveness
- Ensure effective use of limited resources

LLW Strategic Assessment

Priority Actions



- Review and update extended storage guidance
- Develop guidance on 10 CFR 20.2002
- Evaluate DU from enrichment plants
- Update BTP on concentration averaging and encapsulation
- Develop import/export review procedure
- Develop guidance on alternative waste classification
- Perform scoping study of financial assurance



Class B/C Waste Disposal

- Government, industry, medical and research licensees
- Reduce impact of upcoming closing of Barnwell LLW disposal facility
 - Revision of Information Notice 90-09
 - Dialogue with NEI/ERPI re: Proposed Guidance
 - Regulatory Issue Summary
 - Adjustments in inspection program re: LLW Storage

Concentration Averaging BTP



- Need to better risk-inform—last revised in 1995
- Insights from other industry/NRC work on intrusion scenarios and waste classification
- Revision may mitigate impacts of loss of disposal option for some B/C waste

LLW Blending

- Historically a subset of concentration averaging, but limited staff guidance
- Increased industry interest – may help to mitigate restriction of access to Barnwell
- Concept includes both downblending and “upblending”
- May warrant Commission policy decision
- Blending issue identified in LLW SA as part of concentration averaging task

Depleted Uranium



- High Priority Item
 - New waste stream not considered during initial Part 61 rulemaking
 - Very large quantities need disposal
 - Hearing/Commission Memorandum and Order
- Commission Direction in SRM SECY-07-0146
 - “Outside of the LES adjudication, [staff should] consider whether the quantities of depleted uranium (DU) at issue in the waste stream from uranium enrichment facilities warrant amending section 61.55 (a)(6) or the section 61.55 (a) waste classification tables.”
- Currently Staff is developing a Commission paper that will provide options to address DU

Decommissioning Planning Rule



- Legacy Sites Rulemaking
- Proposed rule from SRM-SECY-07-0177
- Rulemaking would result in the following changes:
 - Enhanced Understanding Of Subsurface Contamination
 - Site Specific Decommissioning Estimates
 - Some Increases in Recording and Reporting
- Public comment period for rule ends April 7, 2008

Questions?