

WM2012 Conference Panel Report

PANEL SESSION 82: Draft Revision to NRC Branch Technical Position on Concentration Averaging and Encapsulation

Co-Chairs: Mark Lewis, *EnergySolutions*

Wolfgang Steinwarz, *Siempelkamp Nukleartechnik GmbH*

Panel Reporter: Clint Miller, *Pacific Gas & Electric*

Panelists:

1. Lisa Edwards, *Electric Power Research Institute (EPRI)*
2. Tom Kalinowski, *D.W. James Consulting, LLC*
3. James Kennedy, *US NRC*
4. Clint Miller, *Pacific Gas & Electric*

More than 45 people attended this session that provided an overview of industry comments on the NRC BTP on CA & E and other Stakeholder feedback.

Lisa Edwards kicked off the session with an overview of comments from the nuclear power plant industry on the draft BTP on CA & E. The draft revision contains three main issues that concern the industry. The intruder well drilling scenario is overly conservative, that cartridge filters are still treated as discrete objects when they are different from sealed sources and that averaging limits for activated metals do not adequately consider overall risk. The well driller scenario is not realistic, filters are unlike sealed sources in dimension and nuclide content (very little Cs137) and current limits on averaging for activated metals has resulted in real dose to real people and orphaned waste from disposal.

Tom Kalinowski reviewed several draft changes to the BTP on CA & E that are much appreciated by the industry. Removing the restrictions on absorbed liquids and allowing very small activity sealed sources to be treated as DAW were cited. In addition to the three concerns listed above, the homogeneity test for industry wide blending is impractical and deemed a burden with little to no risk reduction. Though not intended for individual power plants, plants fear a test they could not comply with will be forced on them.

James Kennedy gave an overview of some preliminary views on the comments NRC has received. A wide variety of comments have been submitted by stakeholders including the ACRS. NRC is looking over the well drilling scenario, homogeneity and describing previously approved alternate methods in the BTP.

Clint Miller emphasized that cartridge filters are of concern because the BTP on CA & E is used for filters. Treating filters as discrete objects results in much more effort to characterized them. The paperwork for a container of filters is much larger than for a more hazardous container of resin. In addition, encapsulation is used for filters and object not just sealed sources. The revised BTP should acknowledge approval of concentration averaging for encapsulated filters that the NRC has granted in a Topical Report.

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