



## **Session #14 Panel: Hot Topics in the U.S. Commercial LLW Management**

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**Volume Reduction  
Policy Statement**

**Site-Specific  
Analysis**

**20.2002  
Authorizations**



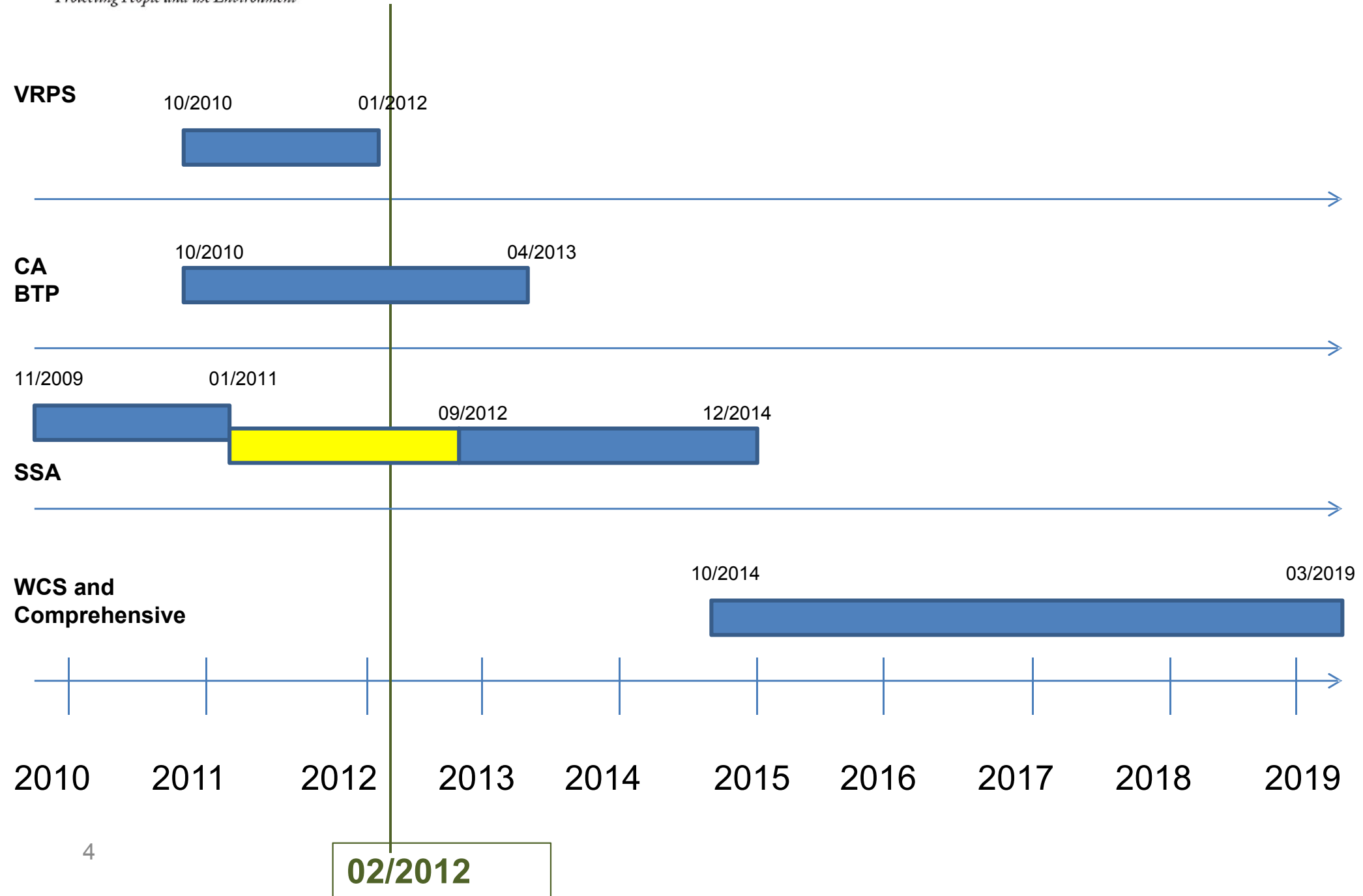
**Concentration  
Averaging Branch  
Technical Position**

**Risk-Inform  
Waste  
Classification  
System**

**Comprehensive  
10 CFR Part 61**

- **Site-Specific Analysis Rulemaking**
- **Risk-Inform, Performance-Base Waste Classification Scheme Framework**
- **Concentration Averaging Branch Technical Position**
- **Volume Reduction Policy Statement**
- **20.2002 Authorizations**
- **Comprehensive Revision to 10 CFR Part 61**

# Timeline (Past & Expected Future)



# Unique Waste Streams Rulemaking

- **Significant Quantities of DU from Commercial Enrichment**
- **Not Considered in 10 CFR Part 61**
- **Commission Direction in Memorandum and Order CLI-05-20**
- **NRC Staff Evaluation in SECY-08-0147**
- **Site-Specific Analysis Rulemaking**
- **01/2012, SRM-CMWDM11-0002**

# Site-Specific Analysis Rulemaking

- **Require Site-Specific Analysis**
- **Period of Performance**
- **Conduct Stylized Human Intrusion Analysis**
- **Establish Intruder Dose Limit of 500 mrem**
- **Incorporate Blending (SECY-10-0043)**
- **Reduce Ambiguity and Facilitate Implementation**
- **Parameters/assumptions Guidance (Public Comment)**

# New Commission Direction

- **Process**
- **Policy**
- **Timeline**
  - **Proposed Rule to Commission in 18 months**
  - **Notify Commission and provide path forward it will take beyond 18 months**
- **Public Outreach**

- **Expand Site-Specific Analysis Rulemaking**
- **Extensive Interactions with Stakeholders**
- **Commission Reserves Judgment on Final Rule Text**
- **Staff Should Immediately Notify Commission if Health & Safety Concern is Identified**
- **Staff Should Balance Information in Developing Period of Compliance**
- **This SRM Only Addresses Four Issues**
  - **Continue other Part 61 activities as Commission directed after this limited SSA rulemaking is done**



- **Licensee Flexibility to Use ICRP Dose Methodologies**
- **Compliance Period for Reasonably Foreseeable Future**
- **Period of Performance Based on Site Characteristics**
  - No specific number of years in the rule itself
- **Disposal Facility Flexibility to Establish Site-Specific Waste Acceptance Criteria**
- **Compatibility Category for Safety Fundamentals/Implementation Flexibility**

# Risk-Informing Waste Classification System

- **SECY-08-0147 Commission Direction to Risk-Inform Waste Classification System**
  - **Staff propose resources**
  - **Using updated assumptions**
  - **Using latest ICRP methodology**
  - **Make conforming changes in Legislation, if needed**

# Risk-Informing Waste Classification System (cont.)

- **Status – Deferred due to:**
  - **Commission Budget Direction In FY12**
  - **Use Resources For SSA Rulemaking In Later Years**
- **Path Forward**
  - **Part Of Any Option For Comprehensive Revision**
  - **Recent Commission SRM Delayed Decision Until After SSA Rulemaking**

# Concentration Averaging Branch Technical Position (BTP)

- **Better Risk-Inform Sealed Source Guidance**
- **Treat Cartridge Filters as Homogeneous Wastes**
- **Clarify New GTCC Direction**
- **Eliminate or Revise Factors of 1.5 and 10 for Discrete wastes**
- **Revisit 100 year Institutional Control Period**

# CA BTP Current Status

- **Major Outcomes of Last Public Meeting**
- **Numerous Comments will be Addressed in Revision**
  - **LLW Forum Disused Source Working Group comments from States that regulate LLW sites**
- **Status**
  - **Revision expected to be available for public comment by 05/31/12 for 60 days**

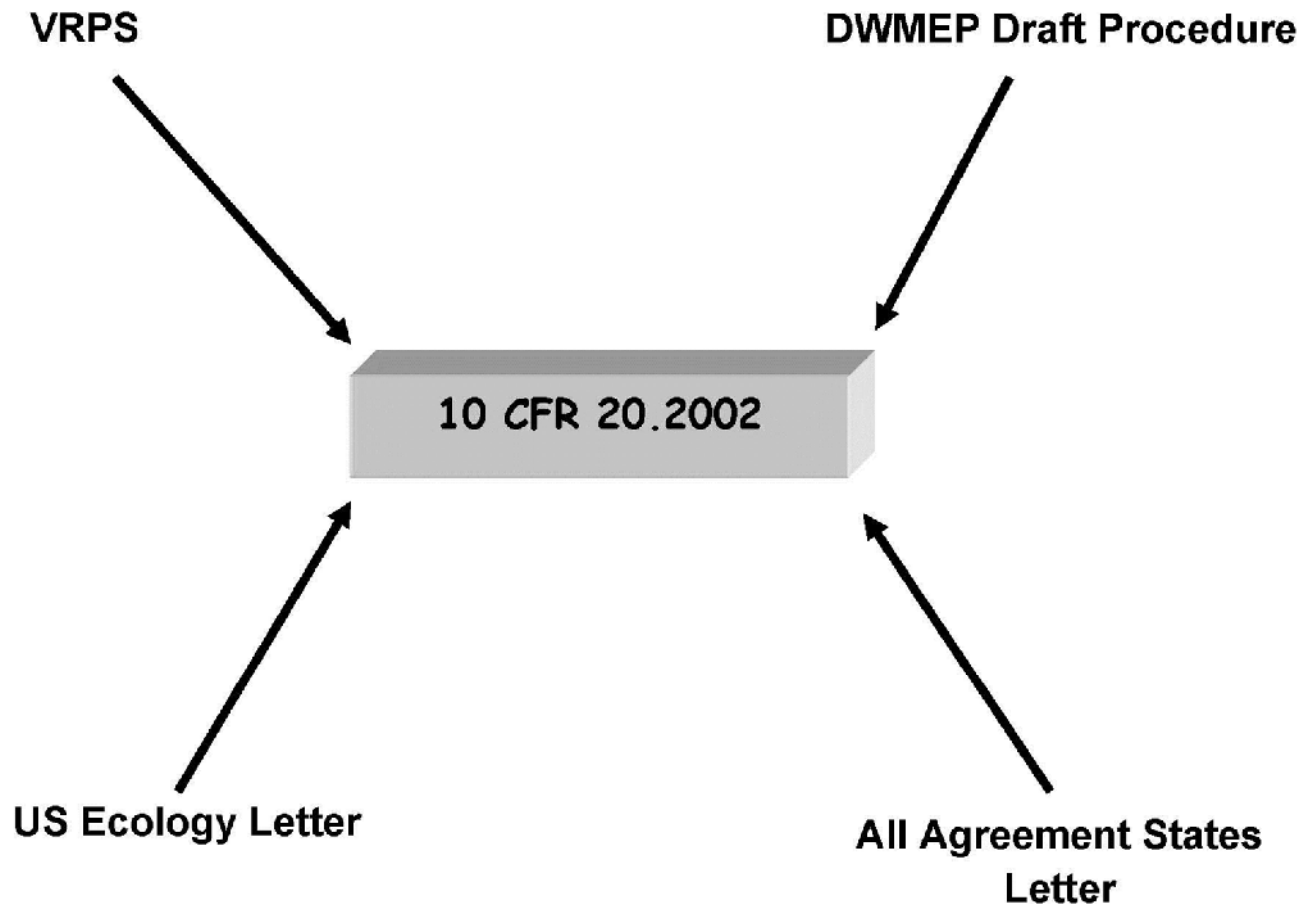
# Volume Reduction Policy Statement

- **1981 Volume Reduction Policy Statement**
- **Blending Concerns**
- **Industry Practices**
- **Maximize All Tools for Waste Management**
- **Published FRN for Public Comments on 08/15/11 (Press Release on 08/17/11)**
- **Comment Period Ended on 10/14/11**
- **Submitted to Commission on 01/09/12**
- **Publicly Available on 01/25/12 (ML113400169)**

# Authorizations Pursuant to 20.2002

- **Procedures Not Otherwise Authorized**
- **Very Low Activity Waste**
- **NRC Processes 10-15 per year; but, increasing in both waste volume and number of requests**
- **RCRA Site or Landfill Disposal**
- **Practice is a few millirem**
- **Guidance Under Development**
- **Warrants Regulatory Review**

# 20.2002 Exemptions





# Comprehensive Revision to Part 61

- **June 17, 2010, Meeting with Staff and Stakeholders on Blending**
  - “the staff should provide the Commission with the staff’s approach to initiate activities related to a risk-informed, performance-based comprehensive revision to Part 61, including the resources and the timeline for completing the rulemaking”
- **SECY-10-0165, Comprehensive Revisions to 10 CFR Part 61**

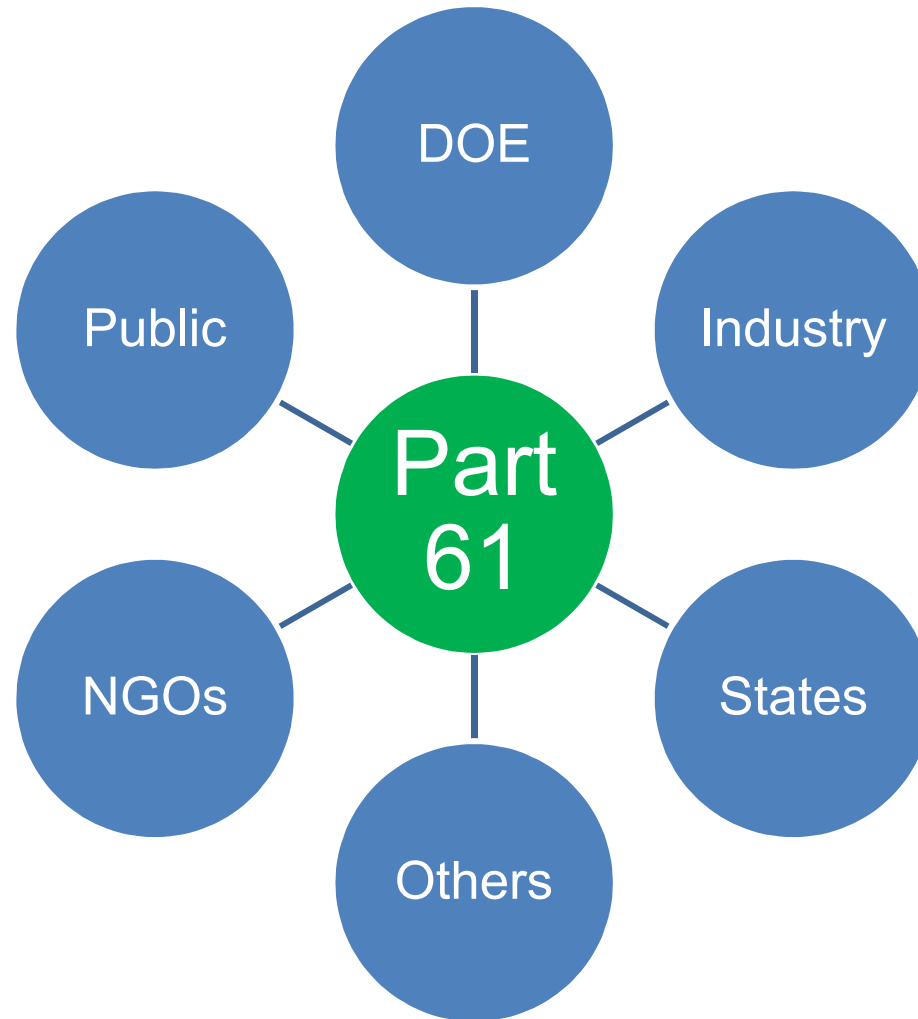
# SECY-10-0165 Options

- **Risk-Inform the Current Part 61 Waste Classification Framework**
- **Comprehensive Revision**
- **Site-Specific Waste Acceptance Criteria**
- **International Alignment**
- **Supersede Direction in SECY-08-0147**

# Staff Recommendation

- **Solicit Stakeholder Views**
- **DOE/NRC Joint Workshop on 03/04/11**
- **Subsequent Workshops in 2011 & 2012**
- **Results and Recommendation to Commission after Public Input**
- **Goal is to Maximize Public Input**

# Part 61 Stakeholders Input



# Maximizing Stakeholder Input (Future Events)

LOCATION	DATE	EVENT
Phoenix, AZ	March 2, 2012	NRC-Sponsored Public Meeting #1 (following WM2012 Meeting)
San Francisco, CA	April 23, 2012	LLW Forum Spring Meeting
Orlando, FL	May 7, 2012	CRCPD Annual Meeting
Dallas, TX	May 15, 2012	NRC-Sponsored Public Meeting #2
Tucson, AZ	May 22, 2012	EPRI Annual LLW Meeting
Rockville, MD	Mid-July, 2012	NRC-Sponsored Public Meeting #3
Sacramento, CA	July 22, 2012	HP Society Annual Meeting
Milwaukee, WI	August 27, 2012	OAS Annual Meeting

- **Recent Commission Direction (01/19/2012)**
  - SRM-COMWDM-11-0002/COMGEA-11-0002
- **Emergent Policy/Technical Issues**
- **SECY-10-0165 Options/Other Options**
- **Other/New Issues**
- **Stakeholder Feedback**
- **Impacts on Future Direction**

# Questions

