



A N D R E W S , T E X A S

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# Major Issues with Updating Waste Classification Framework

- Current waste classification system memorialized in Federal and State laws that are unlikely to change
  - Agreement State laws defining waste classification would need to be changed
  - State Compact laws would probably not change since based on Federal laws. Could have a different regulatory verses Compact definition.
  - Could lead to creation of orphan waste if concentrations would decrease.
- Current system based primarily on the intruder scenario
  - What will be the intruder assumptions for the new classification system?
  - How will wet verses dry sites be considered? Limits could be significantly different. Current system assumes wet site but most current sites are dry.
  - At some dry sites, some radionuclides may have no limits.



## Major Issues with Updating Waste Classification Framework (con't)

- New draft proposed Part 61 appears to eliminate the need for a new waste classification system
  - A site specific WAC eliminates the need for a classification system for most sites
- No obvious health and safety benefits to updating the waste classification system



# Recent Changes

Legislation adopted to increase imported curies:

- 1.167 million curies
- 30% of the initial licensed capacity
- 275,000 curies/yr

Approval to exempt and dispose of waste in the RCRA disposal facility. PA must demonstrate dose to any member of the public or intruder does not exceed 1 mrem/yr

Treatment and storage license merged with LLRW disposal license

Implementation of in-cell bulk disposal in the very near future



# License Changes to Further Support the DOE EM Mission

- ✓ **Depleted Uranium Disposal** – submitted a major amendment to revise the performance assessment to take ~400,000 m<sup>3</sup> of DU (large quantities) as well as other LLW near the Class C limits. *Amendment is expected to be approved by May 2014.*
- ✓ **Removal of Inventory Limits**
- ✓ **Greater Than Class C** – WCS would like to dispose of GTCC in the FWF landfill. DOE is responsible to locate a GTCC disposal facility and their designs look like our landfill. WCS' performance assessment would allow GTCC. TCEQ would need to work with NRC and DOE.



# License Changes to Enhance Commercial Disposal Services

- ✓ **Performance Assessment Update** – submitted a major amendment to accept all LLW near at Class C limits, removal of inventory limits, and DU disposal. *Amendment is expected to be approved by mid 2014.*
- ✓ **Landfill Expansion** – submitted a major amendment to more than double the size of the CWF to over 6 million cubic feet to address capacity questions. *Amendment is expected to be approved in mid 2014.*