



Update on NRC Low-Level Waste (LLW) Program Activities

Low-Level Waste Disposal Proposed Rule-10 CFR Part 61

- Commission issued SRM in SECY-13-0075 on February 12, 2014
- Approved publication of proposed rule and draft guidance for public comment subject to several changes involving:
 - Period of Performance
 - Intruder Assessment
 - Agreement State Compatibility
 - Defense-in-Depth
 - Outreach

SRM – Staff Requirement Memorandum

Proposed Schedule for 10 CFR Part 61 Rulemaking

- Proposed Rule published in Federal Register – March 26, 2015
- Comment Period Ended – September 21, 2015
- Expected Publication Date of Final Rule – July 2016
- Final Rule Effective Date – July 2017
- Compatible Regulations by Agreement States – July 2020

Note: If there are no plans for the development of a LLRW disposal facility, Agreement States would NOT be required to meet the criteria for a compatible LLRW disposal program.

LLW Forum 10 CFR Part 61 Working Group Members

- Brad Broussard – Radioactive Materials Division, Texas Commission on Environmental Quality (sited state)
- Earl Fordham – Washington State Department of Health (sited state)
- Rich Janati – Pennsylvania Department of Environmental Protection (**non-sited state**)
- Susan Jenkins – South Carolina Department of Health and Environmental Control (sited state)
- Rusty Lundberg – Division of Radiation Control, Utah Department of Environmental Quality (sited state)

Revised Branch Technical Position (BTP) on Concentration Averaging

- BTP provides guidance in complying with 10 CFR Part 61.55 (a)(8), “Determination of Concentrations in Waste”, as it applies to classification of waste for disposal
- Final revised BTP was issued on February 25, 2015
- Key revisions involve improved readability, more realistic exposure scenario for sealed sources, blending of waste, and alternative approaches
- Revised BTP has the potential to allow disposal of more LLRW, while maintaining public health and safety.
- **Note:** Disposal continues to be the preferred method for management of LLRW

NRC RIS for Reporting of Phantom 4 Isotopes

- NRC issued RIS 2015-02 on February 18, 2015
- Informs licensees of the option to use “indirect methods” to determine the activity of H-3, C-14, Tc-99 and I-129; i.e., use of scaling factors and material accountability or computer codes
- Cautions that overestimation of disposal site inventory could lead to premature loss of disposal capacity, while under-estimation of inventory could lead to public health and safety concerns
- Allows current method of reporting LLD-based activity values on the uniform manifest
- Encourages the use of improved analytical methods to achieve a lower detection limit

NRC LLW Programmatic Assessment

- Objective of the Updated Assessment: Identify and prioritize tasks that the NRC staff can undertake to ensure safe, reliable, and acceptable regulatory framework for effective LLRW management, while considering future needs and changes that may occur in the nation's commercial LLRW management system
- NRC published a draft list of prioritized LLRW tasks on March 13, 2015 to receive comments from stakeholders
- NRC used the list of 20 previous items from the 2007 strategic assessment as starting point
- The updated list contains 7 high priority tasks, 4 medium priority tasks and 3 low priority tasks

<http://www.regulations.gov> Search Docket ID: NRC-2014-0080