

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
WASHINGTON, D.C. 20555

April 22, 1988

NRC INFORMATION NOTICE NO. 88-16: IDENTIFYING WASTE GENERATORS IN SHIPMENTS
OF LOW-LEVEL WASTE TO LAND DISPOSAL
FACILITIES

Addressees:

Radioactive waste collection and service company licensees handling prepackaged waste, and licensees operating low-level waste disposal facilities.

Purpose:

This notice clarifies 10 CFR Section 20.311 regarding requirements for identifying persons shipping low-level waste to land disposal facilities. The clarifications and suggestions contained in this notice do not constitute new NRC requirements, and no written response is required.

Background:

A new Section 20.311 ("Transfer for disposal and manifests") was added to 10 CFR Part 20 in December 1982. Section 20.311 states that each shipment of radioactive waste to a land disposal facility must be accompanied by a manifest that describes the waste shipment. Among other requirements, this description must include the name, address, and telephone number of the waste generator. The purpose of identifying the waste generator is twofold: It provides a source of information about the waste if questions or problems arise. It enables development of a representative data base showing factors such as actual generators, type of licensee, and state where generated, rather than data skewed by large volumes from brokers or waste collectors.

For waste collector licensees who handle only prepackaged waste, Paragraph 20.311(e) provides two options for shipment manifest preparation. The first option allows the waste collector to prepare a new manifest to reflect consolidated shipments. The new manifest serves as a listing or an index for the detailed generator manifests, which must be attached to the new manifest. The second option allows the waste collector to prepare a new manifest without attaching the generator manifests, provided the new manifest contains for each package the information contained in Paragraph 20.311(b).

Licensed waste processors who treat or repackage waste are considered in Paragraph 20.311(f) to be the waste generators. Waste processors must prepare a new manifest reflecting this responsibility.

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Description of Circumstances:

Contrary to Paragraph 20.311(e)(2), waste collectors who prepare new manifests for shipping prepackaged low-level waste to land disposal facilities have sometimes failed to either consistently identify the original waste generators or consistently provide sufficient information to maintain the identity of the waste generators for each specific waste container.

Discussion:

The intent of Section 20.311 is to ensure that each waste container delivered to a land disposal facility is traceable to a specific waste generator. Waste collector licensees should ensure that disposal facility shipment manifests identify, for each container of prepackaged waste, the name, address, and telephone number of the person generating the waste. Similarly, land disposal operators accepting prepackaged waste from collectors should ensure that container-specific waste generator information is included.

One acceptable approach would be to provide, for each container, a simple generator code (e.g., A, B, C), and refer to an attached list for the name, address, and telephone number of the generator corresponding to the code. Another acceptable approach would be to print the names, addresses, and telephone numbers of the generators directly on the manifest continuation sheets. Other approaches are acceptable provided the required waste generator information corresponds to individual waste containers.

No written response is required by this information notice. If you have questions, please contact this office or the appropriate NRC regional office.



Malcolm R. Knapp, Director
Division of Low-Level Waste Management
and Decommissioning
Office of Nuclear Material Safety
and Safeguards

Technical Contact: G. W. Roles, NMSS
(301)492-0595

Attachment: List of Recently Issued NRC Information Notices

LIST OF RECENTLY ISSUED
NRC INFORMATION NOTICES

Information Notice No.	Subject	Date of Issuance	Issued to
88-15	Availability of U.S. Food and Drug Administration (FDA)-Approved Potassium Iodide for Use in Emergencies Involving Radioactive Iodine	4/18/88	Medical, Academic, and Commercial licensees who possess radioactive iodine.
88-14	Potential Problems with Electrical Relays	4/18/88	All holders of OLs or CPs for nuclear power reactors.
88-13	Water Hammer and Possible Piping Damage Caused by Misapplication of Kerotest Packless Metal Diaphragm Globe Valves	4/18/88	All holders of OLs or CPs for nuclear power reactors.
88-12	Overgreasing of Electric Motor Bearings	4/12/88	All holders of OLs or CPs for nuclear power reactors.
88-11	Potential Loss of Motor Control Center and/or Switchboard Function Due to Faulty Tie Bolts	4/7/88	All holders of OLs or CPs for nuclear power reactors.
88-10	Materials Licensees: Lack of Management Controls Over Licensed Programs	3/28/88	All NRC licensees authorized to use byproduct material.
87-44, Supp. 1	Thimble Tube Thinning in Westinghouse Reactors	3/28/88	All holders of OLs or CPs for nuclear power reactors that employ a Westinghouse NSSS.
88-09	Reduced Reliability of Steam-Driven Auxiliary Feedwater Pumps Caused by Instability of Woodward PG-PL Governors	3/18/88	All holders of OLs or CPs for nuclear power reactors.

OL = Operating License
CP = Construction Permit

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Description of Circumstances:

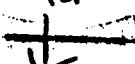
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No written response is required by this Information Notice. If you have questions, please contact this Office or the appropriate NRC Regional Office.

J. Greeves
(Original Signed by )

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Description of Circumstances:

Contrary to paragraph 20.311(e)(2), waste collectors who prepare new manifests for shipping prepackaged low-level waste to land disposal facilities have either not consistently identified the original waste generators or have not consistently provided sufficient information to maintain the identity of the waste generators for each specific waste container.

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No specific action or written response is required by this Information Notice. If you have questions, please contact this Office or the appropriate NRC Regional Office.

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