

From: "ipostoffice.wordnet.att.net" <w.dornsife@worldnet.att.net>
To: "Paul Goldberg" <PFG@nrc.gov>
Date: Wed, Feb 19, 2003 1:26 PM
Subject: Re: AIF Survey

Attached is the Waste Control Specialists response to your survey.

Bill Dornsife
Vp-Nuclear
717-540-5220
301-529-6821(cell)
----- Original Message -----
From: "Paul Goldberg" <PFG@nrc.gov>
To: <w.dornsife@att.net>
Sent: Wednesday, February 19, 2003 9:35 AM
Subject: AIF Survey

Bill,
Thanks for your willingness to respond to this survey. If possible, please get it back to me at this e-mail (pfg@nrc.gov) by Feb. 28. Please feel free to contact me with any questions or comments by e-mail or at 301-415-7842.

Survey of Industry Interest in Development of an Assured Isolation Facility

The Nuclear Regulatory Commission directed the NRC staff to proceed with a rulemaking plan that explores interest in the assured isolation concept for the storage of low-level radioactive waste (LLW) and provides a foundation for a Commission decision on whether to develop a rule. The rulemaking plan should include Agreement State interaction and participation (SRM-SECY-02-0127, 9/5/02, ML022480322). This decision was made in conjunction with the Commission's approval of the staff's proposed response to a letter from the State of Ohio requesting NRC's views on a proposed Ohio regulation for licensing an assured isolation facility. (See 9/12/02 letter to Robert Owen, ML022560082.) Accordingly, the U.S. Nuclear Regulatory Commission staff and the Conference of Radiation Control Program Directors, Suggested State Regulations Committee on Part L, chaired by Robert Owen, State of Ohio, are jointly developing basic information on the projected need for disposal or storage of LLW and projected disposal capacity.

As an important aspect of this basic information, we are interested in knowing the extent of need for and interest in an assured isolation facility that would provide long-term, centralized storage of low-level radioactive waste, including material regulated under the Atomic Energy Act, naturally-occurring material, accelerator-produced material and technologically-enhanced material (discrete sources only for this last). The facility would be open to multiple generators. We exclude mixed radioactive and chemical waste from this inquiry. We realize that any projections for the period of ten years are very uncertain, so we would appreciate rough estimates or ranges, with any qualifications you think appropriate. For purposes of this survey, we do not define an assured isolation facility other than to describe it as an engineered facility that would provide long-term, centralized storage of LLW to multiple generators. The facility could be designated as: 1. Exclusively for storage, with no option for disposal at the AIF; 2. For storage, with the expectation of disposal of the waste at the AIF; or 3. For storage, with the option of disposing of waste at the AIF.

Company: Waste Control Specialists

1. Would you be interested in developing or participating in development of an assured isolation facility (AIF), an engineered, centralized facility for long-term storage of low-level radioactive waste open to multiple generators of waste? Some proposals have included an option to convert the storage facility to disposal after an extended period of active storage operation. Please describe the extent of and reasons for your interest.

2. Do you envision a market for such a facility in the next ten years? If so, please elaborate.

3. Can you provide any estimate of the amount of waste, either regionally or nationally, for which disposal capacity will not be available during this same period of time?

1. Only interested to the extent that it is a state or compact requirement for acceptance of certain types of LLRW. Texas has considered AI as a requirement for compact LLRW disposal. Because of the cost and the fact that it does not provide additional security or safety compared to disposal in a good geology (in fact studies have shown that it may be less safe especially for occupational exposure), Texas is now leaning to monitored and recoverable disposal for high activity LLRW as an alternative to AI.

2. Only if it is required by state or compact as a condition for acceptance of LLRW. It does not make sense from an economic and financial assurance standpoint. Most of the waste must be eventually disposed unless it is assumed that liberal release criteria are established in the future. If licensed as storage and eventual disposal, there is no compelling reason to not directly dispose in engineered structure if necessary. In my opinion AI should only be considered if disposal is not acceptable from a public acceptance or safety standpoint.

3. Can not estimate since it is based on future state and compact decisions. AI is not necessary if disposal is available.