

NOV 11 1991

MEMORANDUM FOR: Ronald R. Bellamy, Chief  
Nuclear Materials Safety Branch  
Division of Radiation Safety  
and Safeguards, RI

FROM: John E. Glenn, Chief  
Medical, Academic, and Commercial  
Use Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS

SUBJECT: GUIDANCE FOR APPROVAL OF DISPOSAL OF RADIOACTIVE WASTE  
BY DECAY-IN-STORAGE

The staff has reviewed Region I's "Guidance for Approval of Disposal of Radioactive Waste by Decay-In-Storage," dated February 4, 1991 (enclosed). This guidance concerns approval of licensing conditions which:

1. Allow licensees to hold radioactive material with a physical half-life of greater than 65 days, but not greater than 120 days, for decay-in-storage before disposal in ordinary trash.
2. Allow the number of half-lives of storage to be reduced to 5 if the licensee provides assurance that, when placed in storage, the waste will contain less than the quantity of radioactive material specified in 10 CFR 20, Appendix C per waste container. The 1/R rule will be used for multiple isotopes.

Requests for relief from 10 CFR 35.92 for waste generated from medical uses should be rare. The Regions must continue to seek NMSS concurrence on responses to such requests.

For non-medical waste, decay-in-storage may be permitted provided that:

1. Policy and Guidance Directive 90-3, "Licensing of Low-Level Radioactive Waste Storage by Materials and Fuel Cycle Licensees" is followed.
2. That isotopes with a physical half-life of greater than 65 days but less than 120 days, or those isotopes to be stored for less than 10 half-lives are specifically listed on the license for decay-in-storage.
3. That the regional office concludes that the survey procedures and the radiation detection/counting instrumentation to be used by the licensee are adequate to determine that waste is at background level.
4. That the licensee's request is granted by a modification of the standard license condition and not as an exemption to 10 CFR 35.92.

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Mr. Ronald R. Bellamy

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It should be noted that the staff has not used Below Regulatory Concern (BRC) criteria in reaching this conclusion, but rather has considered previous regulatory practice and demonstrated need by the licensee.

If you have any questions, please contact Sally Merchant, of this staff on FTS: 492-0637.

~~Authorized Signature~~ Signed By:

John E. Glenn, Chief  
Medical, Academic, and Commercial  
Use Safety Branch  
Division of Industrial and  
Medical Nuclear Safety, NMSS

Enclosure: As stated

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*no legal objection*

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