Meeting Report

DATE: October 4, 2007

TIME: 1:30 P.M. – 4:30 P.M.

PLACE: Nuclear Energy Institute, Room 4 Main
1776 I Street NW, Suite 400
Washington DC 20006-3708

PURPOSE: NEI/EPRI presentations related to LLRW Storage Guidance Development, LLRW Disposal Criteria, and Efforts to Minimize Class BC Waste; and Preliminary NRC Staff Feedback

CATEGORY: Category 2. Public may attend and participate at designated times.

BACKGROUND:

The Nuclear Energy Institute (NEI) and the Electric Power Research Institute (EPRI) are in the process of developing or updating guidance for nuclear power plant licensees for interim storage of low-level radioactive waste at plant sites. Further, EPRI is conducting research related to possible changes in disposal criteria and guidance related to reduced production of Class B/C waste. This meeting afforded NEI/EPRI to provide NRC staff an overview and update on these initiatives and to discuss a process by which NRC may review and comment on the storage guidance report.

DISCUSSION:

This meeting was a follow up to similar meetings on May 17, 2007 and December 6, 2006 at which a number of industry initiatives were discussed.

The primary purpose of this meeting was for NEI/EPRI to review the proposed content and utility of the Guidelines for LLRW Storage. The document provides a compendium of guidance adaptable to different plant circumstances. It is intended to provide alternative approaches and is not intended to be a “cookbook” for inspection. It is viewed by NEI as roughly analogous to a regulatory guide in that it provides a basis for performance and thus a basis for presenting alternative approaches to accomplish objectives.

EPRI staff presented a brief overview of the contents of each section of the draft and reminded NRC that the guidance focused on storage facility operations, not design or construction, because Nuclear Power Plants already have well established design bases. Each section of the report addresses a specific aspect important to interim LLRW storage operations. The document presents guidance at three different levels: regulatory; industry; and recommendations, or good practices.

NEI requested that NRC staff perform a high level review of the current draft and that a follow-up meeting based on the review be held soon, perhaps by the end of October.

Thereafter, NEI would like to formally submit the document in anticipation of a formal regulatory response such as a Regulatory Information Summary.

David James, an EPRI consultant, then presented a summary of investigations into changes in disposal criteria. The purpose was to develop a better understanding of the regulatory bases for 10 CFR Part 61 and to reexamine criteria within the context and limitations of the analytical tools at the disposal of the Part 61 authors. The objective would be to justify more flexibility regarding disposal of certain radioactive waste streams within current statutory and regulatory constraints. During the public comment period, a commenter cited the statutory linkage to the LLRW classification system, potential waste attribution challenges and unintended consequences. Another commenter inquired of the NRC as to the notice or comment period associated with any NRC action on NEI initiatives. NRC considers public notifications on such actions on a case by case basis.

Phung Tran, EPRI, provided a summary of research and strategies to reduce the amount of Class B/C waste produced in NPP operations. These included run length, loading and media separation strategies (see handout). She noted that some of the strategies for reducing the concentration of radionuclides in resins and filter cartridges led to very little increase in overall LLRW volume or worker exposure. NRC staff was interested in seeing data in support of these observations.

ACTIONS:

1. NRC staff to perform a high level review of draft “Guidelines for Operating an Interim On Site Low-Level Radioactive Waste Storage Facility” and propose a follow-up meeting in late October or early November to provide observations.

2. NEI/EPRI to research and provide, as available, data related to waste volumes and worker exposures associated with Class B/C reduction strategies.