



NUCLEAR ENERGY INSTITUTE

Ralph L. Andersen, CHP
DIRECTOR
HEALTH PHYSICS & LLW
NUCLEAR GENERATION DIVISION

May 13, 2008

Mr. Frederick D. Brown
Director, Division of Inspection and Regional Support
U.S. Nuclear Regulatory Commission
Mail Stop O12D3
Washington, DC 20555-0001

Subject: Submittal of Draft EPRI Report, "Guidelines for Operating an Interim On-Site Low-Level Radioactive Waste Storage Facility".

Project Number: 689

Dear Mr. Brown:

This letter provides the draft EPRI report, "Guidelines for Operating an Interim On-Site Low-Level Radioactive Waste Storage Facility," dated February 12, 2008, for NRC review and endorsement.

As used in the guidelines, the term "on-site low-level radioactive waste interim storage" refers to retention at a commercial nuclear power plant licensed under 10 CFR Part 50 or Part 52 of low-level radioactive waste that is ultimately destined for disposal in accordance with NRC regulations and the license for which an authorized disposal option is not currently available.

The industry has developed these guidelines for generic use by Part 50 and 52 licensees to provide a consistent approach to implementing an operational program for safe interim storage of low-level radioactive waste at a commercial nuclear power plant site. The guidelines are specifically not intended as guidelines or criteria for design and construction of a storage facility.

The guidelines were developed by a group of industry experts in the area of low-level radioactive waste management and reflect current regulatory and industry guidance. It is anticipated that licensees using the guidelines will address all aspects of the regulatory and industry guidance contained in the guidelines and document justification for any deviations, including the use of alternative approaches and identification of aspects that are not applicable to a specific storage situation.

Mr. Frederick D. Brown

May 13, 2008

Page 2

The guidelines also include several "Recommendations," that reflect potential program enhancements beyond current regulatory and industry guidance that may be considered by licensees using the guidelines. Although included in this report for the convenience of licensees using the guidelines, the "Recommendations" are not intended to be a part of the requested review and endorsement of the report by the NRC.

The guidelines describe an operational program that is structured to assure safe interim storage of low-level radioactive waste for as long as the full operational lifetime of a nuclear power plant licensed under 10 CFR Part 50 or 52. At the time of decommissioning, it is anticipated that the licensee would obtain a separate license (e.g., Part 30 license) for new or continued interim storage of low-level radioactive waste.

We look forward to receiving feedback from your staff regarding the guidelines and are prepared to address any comments or suggestions that will help improve the guidelines. We would welcome a public meeting to discuss comments, as soon as the staff has completed its review of the guidelines.

If you have any questions, please contact me at (202) 739-8111; rla@nei.org or George Oliver at (202) 739-8016; gxo@nei.org.

Sincerely,



Ralph L. Andersen

Enclosure

c: Mr. Larry W. Camper, FSME, NRC
Ms. Stacey L. Rosenberg, NRR, NRC
Ms Elaine M. Keegan, NRR, NRC
Mr. James A. Shaffner, FSME, NRC
Mr. Scott C. Flanders, FSME, NRC
Ms. Anna Bradford, FSME, NRC
Mr. Steven M. Garry, NRR, NRC
Mr. James E. Kennedy, FSME, NRC