



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

July 5, 1989

The Honorable Kenneth M. Carr
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Carr:

SUBJECT: REPORTING INCIDENTS INVOLVING THE MANAGEMENT AND DISPOSAL OF
LOW-LEVEL RADIOACTIVE WASTES

During its twelfth meeting, June 28-30, 1989, the Advisory Committee on Nuclear Waste (ACNW) met with members of the NRC staff to discuss the current status of activities related to the solidification of low-level radioactive wastes and plans for developing a program for reporting incidents involving the management and disposal of such wastes.

One of the subjects covered was the Workshop on Cement Solidification of Low-Level Wastes convened from May 31 through June 2, 1989, by the NRC staff, in cooperation with the National Institute of Standards and Technology. This appears to have been a very successful meeting and it demonstrated that all affected groups share a desire to solve the problems in this field. One result of the workshop was to identify specific areas that need to be addressed. These include:

1. Development of a better system for characterizing low-level wastes (LLW) and for separating out waste streams with compositions that pose particular problems;
2. More effective application of process control programs so that laboratory tests will be more indicative of what can be anticipated in full-scale operations;
3. Better correlation of testing requirements, procedures, and data with regulations for long-term waste stability and other performance indicators; and
4. Establishment of a system for collecting, storing, and testing of archival samples.

The workshop also confirmed the need to establish a system for reporting incidents involving low-level waste management and disposal. With respect to this item, we believe that the NRC staff should expand its approach to the collection of useful information on LLW management incidents by including exploration of a range of options, e.g., the possible development of cooperative reporting programs with the Nuclear

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Management and Resources Council and/or the Institute of Nuclear Power Operations. One item of concern to the ACNW was the apparent resource limitations within the NRC Division of Low-Level Waste Management and Decommissioning (DLLWMD) to address both this problem and revision of the associated technical position on waste form. Because of the importance of this subject, we recommend that steps be taken to provide sufficient resources to address this problem in an expeditious manner. We believe that a delay of several years in implementing a comprehensive reporting system is highly undesirable in light of the schedules for operation of existing LLW burial facilities and the new facilities planned for establishment through the state compacts.

In the course of discussions with the NRC staff, we explored the options available to implement a reporting process in a timely manner. Of the several possible methods mentioned, we believe that adding a reporting requirement to the topical report system for LLW waste forms could serve as a useful interim approach until explicit procedures for reporting such incidents are in place. We also recommend the issuance of an Information Notice to alert licensees and vendors to the desire of the NRC staff for more complete reporting of such incidents.

Sincerely,



Dade W. Moeller
Chairman