



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

January 30, 1990

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

Dear Chairman Carr:

SUBJECT: NRC PROGRAM ON LOW-LEVEL RADIOACTIVE WASTES

During its 16th meeting, January 24-25, 1990, the Advisory Committee on Nuclear Waste met with representatives of the Division of Low-Level Waste Management and Decommissioning for a review of matters pertaining to the production, treatment, and disposal of low-level radioactive wastes (LLWs). These matters had also been discussed with other members of the NRC staff on several previous occasions. As a result of these reviews, we offer the following comments.

1. While considerable attention has been given to the development of requirements for the siting, construction, and operation of disposal facilities, there appears to be a lack of coordination of these activities with the processes that produce the wastes. It is these processes which, in turn, determine the chemical and physical characteristics, radionuclide content, and volumes of the wastes. In our opinion, these processes and the resulting products may have as much bearing on the protection of public health and safety as do the requirements for the disposal facilities. We believe this is an excellent example where a systems approach could yield dividends. Before this can be accomplished, however, there is a need for closer coordination of relevant activities by NMSS, NRR, and RES.
2. Under the requirements of the Low-Level Radioactive Waste Policy Act and amendments, a number of states and state compacts are moving forward to develop plans for the siting and construction of low-level radioactive waste disposal facilities. Although the NRC staff has prepared a multitude of reports containing information that would be useful to the Agreement States and LLW facility developers, there is currently no single document containing comprehensive guidance or a "road map" to

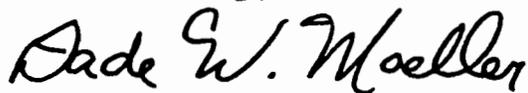
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reports that pertain to this topic. To correct this situation, we recommend that a guidance document containing a summary of relevant laws and key regulations, regulatory guides, NUREG documents, and technical positions, suitably annotated and cross-referenced, be prepared. To the extent practical, pertinent standards developed by the U.S. Environmental Protection Agency and applicable key documents developed by the U.S. Department of Energy might also be cited in this report.

3. The Committee continues to believe that a need exists for a system through which the benefits of operating experience can be factored into NRC activities related to the generation and disposal of LLW. One contribution to this subject would be the preparation of a report based on a definitive review and digest of the experience gained at the Maxey Flats, Sheffield, and West Valley disposal facilities.
4. The Committee is concerned about the availability of adequate disposal capacity, licensed under the provisions of 10 CFR 61, Licensing Requirements for Land Disposal of Radioactive Waste, to accommodate LLWs after the scheduled closure in 1992 of the currently operated Barnwell, South Carolina, and Beatty, Nevada, disposal facilities. We urge that the Commission increase its efforts to encourage the States to accelerate the process for developing suitable disposal facilities.

We hope these comments will be helpful.

Sincerely,



Dade W. Moeller
Chairman