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NRC Forms 540 and 540A, Uniform Low-Level Radioactive Waste Manifest and NUREG/BR-0204; NRC Forms 541 and 541A, Uniform Low-Level Radioactive Waste Manifest Container and Waste Description; NRC Forms 542 and 542A, Uniform Low-Level Radioactive Waste Manifest Index and Regional Compact Tabulation

Comment On: NRC-2010-0091-0001

Agency Information Collection Activities: Proposed Collection; Comment Request

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General Comment

General Comments:

The NRC neglected to cite in Item 3 "How often the collection is required:" that the DOE collects information on Forms 541 and 542 from the disposal sites and has it loaded into the national Manifest Information Management System (MIMS). NRC also states that "No reporting" is made to the NRC, however power plants are required to report Solid Radwaste Effluents to the NRC annually per RG 1.21 and this information comes from these manifest. Thus, there is an annual reporting to the NRC.

NRC should consider revising Regulatory Guide 1.21 to require reporting of LLW disposal shipments of licensee waste. This means shipments "from" waste processors of licensee LLW to a disposal site would be reported annually to the NRC versus bulk shipments of material to processors for which the Waste Class cannot be determined. This change to RG 1.21 would align the NRC reporting requirements with the MIMS data base. If that approach is taken, NRC should allow licensees to transmit MIMS data electronically to NRC to eliminate the burden of preparing annual Solid Radwaste Reports. Working with DOE, NRC and licensees could develop an electronic report to meet the RG 1.21 requirements. Such reporting can then be expanded for licensees to submit reports to Compacts and States as required from the MIMS data base and eliminate the burden of producing redundant reports.

Response to Questions in the Federal Register Notice

Call = T. Donnell (tud)

1. a. Since the NRC does not acknowledge it collects this data, it would not appear this data is necessary for NRC to properly perform its function. However, Annual Solid Radwaste Effluents are required to be reported to

*SOVSE Review Complete
Template = ADM-013*

E-RIDS = ADM-03

Call = D. Burnette (dmb2)

the NRC for its oversight function and the information on these forms is needed to produce these reports.

1.b. The information has a practical utility once it is properly compiled by the DOE in the MIMS data base. MIMS reports can (or could) be used to report LLW disposal quantities to States, Compacts and the NRC.

2. Continued use of these Forms as they are is no more or less burdensome than the non-uniform manifest Forms used previously.

3. I don't think any changes need to be made to these Forms.

4. What is burdensome is that the information on these forms must be reported to several different entities (States, Compacts, the NRC). The redundant transcription of data from one format to another could be eliminated if NRC would work with DOE to improve the MIMS data base and report generation from this national data base.