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Request for Comments on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management

Comment On: NRC-2011-0183-0001

Request for Comments on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management

Document: NRC-2011-0183-DRAFT-0003

Comment on FR Doc # 2011-20666

Submitter Information

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FILES
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General Comment

Please see attached comments.

Attachments

NRC-2011-0183 Studsvik Comments

*SONSI Review Complete
Template = ADM-013*

*FRIDS = ADM-03
Cdd = D. Lowman (dbl)*

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Via Electronic Filing

September 12, 2011

Ms. Cindy Bladey, Chief
RADB
Office of Administration
Mail Stop TWB-05-B01-M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Docket ID NRC-2011-0183

Dear Ms. Bladey:

Studsvik is a low-level radioactive waste processor whose patented THOR technology achieves significant volume reduction of radioactive resins, filters and other wet waste while creating an extremely robust and stable waste form with significant environmental benefits. In addition to providing the benefits of the THOR technology to commercial LLW generators, it is also employed by the Department of Energy at Idaho National Labs and Savannah River.

Studsvik was also an active participant in the interaction between NRC and various stakeholders that formed the basis of SECY-10-0043 and the subsequent Staff Requirements Memorandum. It was clear from that process that the 1981 Policy Statement on volume reduction of LLW needed review and revision. Studsvik is pleased that a draft is available for comment and the timing is fortuitous in light of the significant changes (and challenges) occurring with regard to management of LLW.

On the whole, Studsvik is pleased with the general concepts of the draft Policy Statement. Nevertheless, Studsvik does have some specific comments for consideration as set forth below.

1. Minimization and volume reduction. These terms are used interchangeably and somewhat inconsistently in the draft Policy Statement. Studsvik understands the term "minimization" to refer to the situation where licensees (more generally "generators") create less LLW, i.e., where generators minimize the amount of LLW generated. Only a generator can engage in LLW minimization. "Volume reduction" means applying certain techniques to shrink the size of the waste that is created. Examples of volume reduction include: supercompaction, incineration, pyrolysis, etc. Volume reduction techniques can be employed by the generator or more commonly by third party processors. These terms should be clearly defined and appropriate revisions should be made to clarify when one or both terms apply to specific portions of the draft Policy Statement.

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2. Recognize Innovation. While the draft Policy Statement does an admirable job of describing the benefits of volume reduction (and minimization), it should recognize that innovations resulted from the commitment made by stakeholders to the ideals captured in the 1981 Policy Statement. These innovations offer significant protections to the public and the environment. The draft Policy Statement should further encourage continued commitment to innovations in LLW management that embrace the risk-informed performance-based approach to regulating LLW.

3. Create a hierarchy of waste management. It is unclear whether the bullets describing available means for waste management are ranked by order of preference or simply listed in no order. Studsvik believes that it would be instructive to stakeholders and the public to place the bullets in preferential (greatest to least) order and suggests the following:
 - a. Waste Minimization
 - b. Use of alternative disposal provision contained in 10 CFR 20.2002
 - c. Use of waste processing technologies to achieve volume reduction
 - d. Use of licensed disposal facilities
 - e. Short-term storage and decay
 - f. Long-term storage

The draft Policy Statement should also confirm the definitions of short-term and long-term storage for clarity to the reader.

4. Agreement State and Compact adoption. The draft Policy Statement should encourage Agreement States and Compacts to adopt the policy. In particular, adoption by Agreement States and Compacts with disposal sites will further encourage stakeholders to embrace the concepts set forth in the draft Policy Statement.

Feel free to contact me should you have any questions or should you require any additional information.

Sincerely,



Joseph DiCamillo
General Counsel

JGD:s
