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**Docket:** NRC-2011-0183

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

**Comment On:** NRC-2011-0183-0004

Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management

**Document:** NRC-2011-0183-DRAFT-0006

Comment on FR Doc # 2011-24226

## Submitter Information

**Name:** Lisa Edwards

**Address:**

3722 Cove Timber Ave.  
Granbury, TX, 76049

**Submitter's Representative:** Billy Cox

**Organization:** Electric Power Research Institute

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## General Comment

Uploaded file contains scanned comment letter, original sent via USPS.

## Attachments

NRC Comment Letter VR 10-2011

*SONSI Review Complete  
Template = ADM-013*

*FRIDS = ADM-03  
Add = D. Lowman (tbl1)*

10/13/2011

Ms. Cindy Bladey  
Chief, Rules, Announcements, and Directives Branch (RADB)  
Office of Administration, Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Comments on the Draft Policy Statement on Volume Reduction and Low-Level  
Radioactive Waste Management. Docket ID NRC-2011-0183

Dear Ms. Bladey,

The Electric Power Research Institute (EPRI) is submitting comments in response to the subject notice. Significant strides have been made by the nuclear industry in volume reduction since the original 1981 Policy Statement on Low-Level Waste (LLW) Volume Reduction. EPRI research indicates that since the loss of access to the Barnwell (South Carolina) LLW disposal facility to out-of-compact waste in 2008, volume reduction techniques have reduced radwaste volumes from an estimated 20,000 cubic feet per year per 1,000 MWe to less than 10,000 cubic feet per year per 1,000 MWe today. In addition, improved fuel performance and attention to operations have reduced the total activity in the waste; average activity levels between 2001 and 2006 were 69.2% less than the activity average in 1985.

Waste management practices, as they affect volume reduction, should take into account a full range of considerations, including but not limited to: the dose consequences to workers, members of the public and to the inadvertent intruder, access for waste disposal as opposed to on-site storage and the operational efficiency of low level radioactive waste management. In light of these considerations, EPRI research supports the NRC position of taking a risk-informed approach to their blending position as it relates to volume reduction.

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3420 Hillview Avenue, Palo Alto, CA 94304-1338 USA • 650.855.2000 • Customer Service 800.313.3774 • [www.epri.com](http://www.epri.com)

Ms. Cindy *Bladey*

10/13/2011

Page 2

EPRI research does not indicate that the changes as proposed in the draft volume reduction policy would have an effect on overall costs of disposal. Volume reduction in itself does not assure lower disposal costs because disposal site costs are controlled predominantly by fixed expenses. The current high cost of disposal is due, in part, to aggressive volume reduction efforts. In fact, low waste volumes are often cited by disposal site developers as an important reason for not developing a specific site, in that there would not be sufficient material to operate the site economically. In testimony before the Texas and Vermont Low Level Waste Compact Commission, Waste Control Specialists indicated that the inability to import out-of-compact wastes would render the facility non-viable. The NRC policy change recognizes that little more can be achieved by establishing volume reduction as an end in itself. EPRI research supports a balanced and risk-informed approach that enables LLW generators to manage wastes with the most efficiency and without compromising safety.

Best Regards,

A handwritten signature in cursive script, appearing to read "L Edwards".

Lisa Edwards  
EPRI Program Manager  
469-586-7468