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**To:** Ms. Cindy Bladey  
**Company:** U.S. Nuclear Regulatory Commission  
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**From:** Duane Bollig

**Subject:** **Docket: NRC-2011-0217**  
Comments to: RIS - Policy Regarding Submittal of Amendments for Processing  
of Equivalent Feed at Licensed Uranium Recovery Facilities

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Add = T. Carter

(THCI)



November 10, 2011

Via facsimile (301.492.3446)

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

Re: Docket: NRC-2011-0217  
Comments to: *RIS – Policy Regarding Submittal of Amendments for Processing of  
Equivalent Feed at Licensed Uranium Recovery Facilities.*

Dear Ms. Bladey:

Water Remediation Technology LLC (WRT) appreciates the opportunity to comment on the draft Regulatory Issue Summary (RIS) referenced above. Firstly, WRT commends the NRC for its efforts to develop a streamlined approach for more-efficiently handling uranium water treatment resins. Recognizing these uranium-loaded resins (ULR) as equivalent feed that can be processed at a uranium recovery facility, likely without requiring a license amendment for the facility, will provide community water systems (CWS) with a more cost effective option for the disposition of treatment residuals and the overall compliance with the Safe Drinking Water Act regarding radionuclides.

In the following comments, I will refer to the section heading name and to the column and page number of the Federal Register document.

1. Expanded Scope and Definition of Equivalent Feed
  - *Intent*, footnote 1, page 60942
  - *Background*, column 3, page 60942;
  - *Summary of Issue*, column 3, page 60943

WRT agrees with the first half of the NRC's definition of equivalent feed (see footnote 1, above), namely:

*" . . . equivalent feed is: ion exchange (IX) resin that is loaded with uranium at a facility other than a licensed uranium recovery facility. . . "*

Then, however, the NRC staff appears to possibly be limiting the applications that would be considered for equivalent feed to "certain source material operations" such as community water treatment (implying drinking water) and mine dewatering. This reference to just these two applications is made a number of times in the RIS. It's somewhat unclear whether the staff was simply citing examples, or limiting the scope of the definition of equivalent feed.

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WRT suggests that the NRC either clarify or expand the scope of the definition of equivalent feed to apply to any uranium water treatment in general and any secondary or byproduct recovery process that captures uranium on resin (e.g., non-primary mineral processing). As an example of the need for a broad definition and scope regarding water treatment, WRT is currently operating a uranium treatment system for alluvial groundwater remediation, an application that is neither drinking water treatment nor mine dewatering. This groundwater remediation application would also benefit from being able to send equivalent feed to a uranium recovery facility.

2. Radiological Content of Equivalent Feed  
- *Summary of Issue*, column 2, page 60943

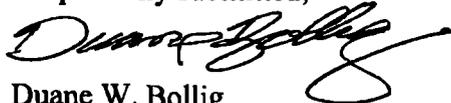
The RIS states that the NRC staff is defining the term "equivalent feed" as:

"...where the feed material is essentially the same in physical form and radiological content (emphasis added) as the source material that is normally processed at a uranium recovery facility."

If by "radiological content", the staff means that the equivalent feed resin has captured and collected essentially the same types of radionuclides (primarily uranium) as the source material that is normally processed at a uranium recovery facility, then WRT agrees with this criteria or definition. If, however, by "content", the staff's intent is that the equivalent feed resin have essentially the same uranium concentration or loading (as in, mg U/kg resin, or lb U/cu ft resin), then WRT disagrees with this criteria. It would be typical to expect that the uranium concentrations on water treatment resins would be less than the concentrations on process resins at an ISR facility. The uranium concentration in the water at a drinking water or groundwater application can be expected to be several orders of magnitude less than that in the water of an ISR well field, for example. Consequently, there is likely a smaller uranium concentration driving head in a water treatment application, which will result in less uranium loading on the water treatment resin. As with the staff's existing definition of alternate feed, the criteria that should be applied to equivalent feed is that it contain a recoverable amount of uranium. Also, it should be up to the person offering the equivalent feed resin and the uranium recovery facility, and not the role of the NRC, to develop the economics and agree on a processing cost to accept and process these resins.

Once again, all of us at WRT appreciate the NRC's time and efforts in developing this new approach to efficiently handling uranium water treatment resins. Please feel free to call me at 303.424.5355 x108 if you have any questions related to these comments.

Respectfully submitted,



Duane W. Bollig  
Vice President – Business Development & Government Affairs

cc: Mike Dimitriou  
Chris Pugsley, Thompson Pugsley PLLC  
Ted Carter, NRC