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OMB Clearance Package for 3150-0143, 10 CFR Part 62, Criteria and Procedures for Emergency Access to Non-Federal and Regional Low-Level Waste Disposal Facilities

Comment On: NRC-2014-0237-0001

Agency Information Collection Activities: Proposed Collection; Comment Request

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General Comment

See attached file(s)

Attachments

10 CFR Part 62

NRC Information Collection Activities: Proposed Collection; Comment Request

PA Dept. of Environmental Protection Bureau of Radiation Protection

Question 1 – Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

1. Yes, the information is necessary for the NRC to determine if denial of disposal constitutes an immediate threat to public health and safety and national security. It would enable NRC to determine whether there are alternatives available (i.e., storage, processing, etc.). The information would also enable NRC to decide on an appropriate facility for disposal of LLRW if emergency access or an extension of emergency access is warranted. As such, the information has practical utility.

Question 2 – Is the burden estimate accurate?

2. Due to lack of prior experience with 10 CFR Part 62 and emergency access request, it would be difficult to predict the number of requests and the cost associated with each request. It should be mentioned that due to the availability of the commercial LLRW disposal facilities in Texas, Utah, South Carolina and Washington and the federally funded programs such as the Source Reduction and Collection (SCATR) program and Off-Site Source Recovery Project (OSRP), it is unlikely that there would be a request for emergency access during the next three years or so.

Question 3 – Is there a way to enhance the quality, utility, and clarity of the information to be collected?

3. The information request contained in Subpart B of 10 CFR 62 is comprehensive and necessary for a Commission determination. As it relates to the LLRW under consideration, the contents of request for emergency access should be consistent with the information provided on the NRC Form 540, "Uniform LLRW Manifest - Shipping paper" and Form 541, "Uniform LLRW manifest-Container and Waste Description".

Question 4 – How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

4. The NRC should consider constructing a database using Forms 540 and 541. This database, using a standard format, would be suitable for collecting information [on line] regarding LLRW for which emergency access is requested. Using an electric database format for the waste and

other information requests contained in Subpart B would improve efficiency and should alleviate duplication of efforts.