

**From:** [Jenkins, Susan](#)  
**To:** [Poy, Stephen](#)  
**Cc:** [Garner, Lynne](#); [Scaturo, David M.](#); [Isiminger, Crispulo](#)  
**Subject:** RE: Implementation of 10 CFR Part 61  
**Date:** Monday, May 18, 2015 4:56:25 PM  
**Attachments:** [GTCC Waste Disposed at the BDF 05-18-2015.pdf](#)

---

Steve,

Please find attached the list of five GTCC disposals at the Barnwell LLRW Facility from 1998 to present, all occurring between 1999 and 2004 along with a brief summary of each. As I mentioned in the call, our files are organized such that we were able to efficiently search disposal requests from January 1998 to present. According to our records, there were no sealed sources disposed during that timeframe that were GTCC. In consultation with the operator and based upon the memory of our current staff, we are not aware of any GTCC disposals prior to 1998. We would need to do a full review of the historical license file to provide confirmation, which would be very time consuming.

Please let me know if you require further information.

Thanks,  
Susan

Susan Jenkins, Manager  
Infectious and Radioactive Waste Management Section  
Division of Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

803- 898-0377 - office  
803-898-0391 - fax

[jenkinse@dhec.sc.gov](mailto:jenkinse@dhec.sc.gov)

---

**From:** Poy, Stephen [mailto:Stephen.Poy@nrc.gov]  
**Sent:** Thursday, May 14, 2015 4:34 PM  
**To:** Jenkins, Susan  
**Subject:** RE: Implementation of 10 CFR Part 61

Thanks,

Steve

---

**From:** Jenkins, Susan [<mailto:jenkinse@dhec.sc.gov>]

**Sent:** Thursday, May 14, 2015 4:29 PM  
**To:** Poy, Stephen  
**Subject:** RE: Implementation of 10 CFR Part 61

Stephen,

We plan to send the information on Monday May 18.

Thanks,  
Susan

Susan Jenkins, Manager  
Infectious and Radioactive Waste Management Section  
Division of Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

803- 898-0377 - office  
803-898-0391 - fax

[jenkinse@dhec.sc.gov](mailto:jenkinse@dhec.sc.gov)

---

**From:** Poy, Stephen [<mailto:Stephen.Poy@nrc.gov>]  
**Sent:** Thursday, April 30, 2015 11:32 AM  
**To:** Jenkins, Susan  
**Cc:** Wong, Melanie; White, Duncan; Einberg, Christian  
**Subject:** RE: Implementation of 10 CFR Part 61

Susan,

I just spoke with Melanie. We were made aware of the fact that there were some disposals of GTCC in about the 2006 time frame. NRC had not made any requests with regard to this information previously. Would it be possible for you to provide information on the disposals you discussed on the call?

Thanks much,

Steve

Stephen Poy

Agreement State Programs Branch

Division of Material Safety, State, Tribal, and Rulemaking Programs

Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission

phone: 301 415 7135

fax: 301 415 5955

email: [stephen.poy@nrc.gov](mailto:stephen.poy@nrc.gov)

mail stop: T-8E24

---

**From:** Jenkins, Susan [<mailto:jenkinse@dhec.sc.gov>]

**Sent:** Thursday, April 30, 2015 10:24 AM

**To:** Poy, Stephen

**Subject:** RE: Implementation of 10 CFR Part 61

Steve,

During the call, Melanie mentioned that NRC has a list (or a single request – I wasn't clear) of GTCC requests that I am assuming were provided to NRC by the State of SC at some point in the past. I assume they are requests that came to the State for a decision, a decision was rendered and the information was forwarded at a later date upon NRC's request. Again, this is my understanding based on what Melanie said but I am not certain I have the correct understanding as we didn't get into that much detail on the call.

Thanks,

Susan

Susan Jenkins, Manager  
Infectious and Radioactive Waste Management Section  
Division of Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

803- 898-0377 - office

803-898-0391 - fax

[jenkinse@dhec.sc.gov](mailto:jenkinse@dhec.sc.gov)

---

**From:** Poy, Stephen [<mailto:Stephen.Poy@nrc.gov>]  
**Sent:** Wednesday, April 29, 2015 3:59 PM  
**To:** Jenkins, Susan  
**Subject:** RE: Implementation of 10 CFR Part 61

Susan,

Can you clarify which NRC requests to the Barnwell facility you are referring to in your email below?

Thanks,

Steve

---

**From:** Jenkins, Susan [<mailto:jenkinse@dhec.sc.gov>]  
**Sent:** Friday, April 24, 2015 5:11 PM  
**To:** Poy, Stephen  
**Cc:** White, Duncan; Dembek, Stephen; Einberg, Christian  
**Subject:** RE: Implementation of 10 CFR Part 61

Steve,

Researching our records, here is what I found:

- License conditions for waste classification (including the Part 61 waste classification tables) and several related Part 61 requirements (e.g. stability and waste segregation) were added to the license for the Barnwell Disposal Facility effective **December 27, 1983**.
- Part 61 was adopted and published as final in the South Carolina State Register **August 22, 1986**.
- A license condition requiring compliance with the state's equivalent of Part 61, was added to the license effective **January 1, 1990**.

Please let me know if I can provide additional assistance.

Also, can you send me the list of GTCC requests that NRC has for the Barnwell Facility. I plan to send you the list we discussed yesterday as well.

Thanks,  
Susan

Susan Jenkins, Manager  
Infectious and Radioactive Waste Management Section  
Division of Waste Management  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

803- 898-0377 - office  
803-898-0391 - fax

[jenkinse@dhec.sc.gov](mailto:jenkinse@dhec.sc.gov)

---

**From:** Poy, Stephen [<mailto:Stephen.Poy@nrc.gov>]  
**Sent:** Friday, April 24, 2015 3:35 PM  
**To:** Jenkins, Susan  
**Cc:** White, Duncan; Dembek, Stephen; Einberg, Christian  
**Subject:** Implementation of 10 CFR Part 61

Good Afternoon,

Steve Dembek of the Division of Decommissioning, Uranium Recovery, and Waste Programs in the Office of Nuclear Material Safety and Safeguards is gathering information related to the implementation of 10 CFR Part 61 in the Agreement States. This effort is related to the request for comments outlined in STC-15-020, *FEDERAL REGISTER* NOTICE – Request for Comments on Draft Programmatic Assessment Results.

In particular, he is interested in exactly when it was that 10 CFR Part 61 was implemented by the State of South Carolina. We did some digging and we know that the development of 10 CFR Part 61 was concluded in December of 1982.

I believe during our call yesterday related to Greater than Class C waste disposal you made the reference that South Carolina may have implemented Part 61 around 1981 or 1982.

If you could provide a little more information, we would appreciate it.

Thanks much,

Steve

Stephen Poy

Agreement State Programs Branch  
Division of Material Safety, State, Tribal, and Rulemaking Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission

phone: 301 415 7135  
fax: 301 415 5955  
email: [stephen.poy@nrc.gov](mailto:stephen.poy@nrc.gov)  
mail stop: T-8E24