

PUBLIC SUBMISSION

As of: 12/19/17 11:15 AM
Received: December 18, 2017
Status: Pending_Post
Tracking No. 1k1-90fe-qaeg
Comments Due: December 18, 2017
Submission Type: Web

Docket: NRC-2017-0198
Guidance Document for Alternative Disposal Requests

Comment On: NRC-2017-0198-0001
Revision of the Guidance Document for alternative Disposal Requests

Document: NRC-2017-0198-DRAFT-0013
Comment on FR Doc # N/A

10/19/2017

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General Comment

Section 11 of the guidance states:"The PM should verify that the proposed disposal is in accordance with the Waste Acceptance Criteria for the facility (available at www.usecology.com)." My experience is the multiple waste acceptance criteria at RCRA facilities can be complicated at best. The NRC should consider putting the burden of demonstrating the wastes meeting the facility waste acceptance criteria to the licensee to document in a letter as signed by the facility and the licensee. An alternate recommendation would be to have a smaller group of NRC staff that perform these evaluations so that the intricate details of each facilities waste acceptance criteria can be understood. The former would likely be easier to implement.

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= R.L. Glynn (pxg9)