

# PUBLIC SUBMISSION

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Guidance Document for Alternative Disposal Requests

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

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## Submitter Information

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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](http://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

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