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Very Low-Level Radioactive Waste Scoping Study

Comment On: NRC-2018-0026-0001
Very Low-Level Radioactive Waste Scoping Study

Document: NRC-2018-0026-DRAFT-0032
Comment on FR Doc # 2018-03083

Submitter Information

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General Comment

See attached file(s)

Attachments

05.15.18 Submitted VLLW Comments

SUNSI Review Complete

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ADD= Kellee Jamerson

COMMENT (#32)

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NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

May 15, 2018

May Ma
Office of Administration
Mail Stop: OWFN-2-A13
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Docket ID: NRC-2018-0026 – Very Low-Level Radioactive Scoping Study

Dear May Ma:

The Nevada Division of Environmental Protection (“NDEP”) is providing comment on the U.S. Nuclear Regulatory Commission’s (“NRC”) very low-level radioactive waste (“VLLW”) scoping study to identify possible options to improve and strengthen the NRC’s regulatory framework for the disposal of VLLW.

NDEP is providing these comments in connection with its oversight of Low-Level Radioactive Waste (“LLW”) disposal at the Nevada National Security Site (“NNSS”) (formerly the Nevada Test Site) located in Nye County, NV, as provided for under agreement with the US Department of Energy (“DOE”). The Nevada Division of Public and Behavioral Health, Radiation Control Program is the agency that implements the Nevada Agreement State Program on behalf of the State of Nevada.

NDEP notes that one of the tasks of the VLLW Scoping Study, as discussed in the 2007 “Strategic Assessment of Low-Level Radioactive Waste Regulatory Program,” is to coordinate with other agencies on consistency in regulating low activity waste. NDEP is particularly interested in consistency between how NRC and DOE regulate LLW, with the expectation that consistency will increase potential commercial disposal options for DOE LLW and decrease reliance on disposal at NNSS.

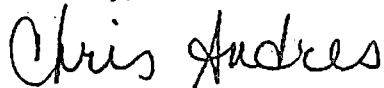
With regard to the specific questions for input included in the February 14, 2018 request for public comment, NDEP offers the following:

1. Management requirements for all LLW, including VLLW, should be based on the inherent characteristics and hazards of the waste (i.e. activity, half-life, fissile content), rather than categorized based on the waste originating processes or by exclusion.
2. Management requirements and categories for wastes should not be specified solely based on select elements and associated isotopes, rather, they should be based on the inherent characteristics and hazards of the waste, normalized to equivalent measurements across species and correlated directly to risk.

3. NDEP encourages the NRC to either expand its existing alternative disposal request guidance or develop new guidance specifically for VLLW based on the characteristics of the waste and risks to human health and the environment. As noted in the October 2016 National Academy of Sciences, Engineering and Medicine ("NAS") LLW Management and Disposition Workshop, the existing LLW classification lacked predictability and transparency and has a lack of clear correlation between inherent waste characteristics and allowable management/disposal options.

NDEP appreciates the opportunity to comment on the NRC's VLLW scoping study to identify possible options to improve and strengthen the NRC's regulatory framework for the disposal of VLLW. Please contact me at candres@ndep.nv.gov or 702-486-2850, ext. 232 to discuss this matter further.

Sincerely,



Christine Andres
Chief
Bureau of Federal Facilities

cc: Karen Beckley, Health Bureau Chief, Nevada Division of Public and Behavioral Health
Robert Boehlecke, EM Nevada Program Manager, Nevada Field Office, Las Vegas, NV
Scott Wade, Senior Advisor for Environmental Management, NNSA/NFO, Las Vegas, NV
Greg Lovato, Administrator, NDEP