



State of Utah

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DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

September 13, 2018

John Tappert, Director
Division of Decommissioning, Uranium Recovery and Waste Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Mail Stop T8 F5
Washington, DC 20555-0001

RE: NRC SECY-08-0147 Interpretation

Dear Mr. Tappert:

In 2008, NRC staff completed a probabilistic, technical analysis to understand the impacts of near-surface disposal of large quantities of depleted uranium (DU), such as those expected to be generated at uranium enrichment facilities. The technical analysis addressed whether amendments to paragraph 61.55(a) are necessary to ensure large quantities of DU are disposed of in a manner that meets the performance objectives in Subpart C of 10 CFR Part 61. The analysis concluded that near-surface disposal of large quantities of DU may be appropriate, but not under all site conditions. Shallow disposal of large quantities of DU or disposal at humid sites with a potable groundwater pathway would likely result in the performance objectives not being met.

It was recommended that, when considering disposal of significant quantities of DU oxides (a waste stream from uranium enrichment facilities), a site-specific performance assessment is warranted.

The Utah Division of Waste Management and Radiation Control would like to know if the NRC has a position regarding the need to also perform a site-specific performance assessment for other forms of DU (such as metallic DU penetrators used by the Department of Defense). The technical analysis performed in SECY-08-0147 appears to focus on DOE waste comprised of uranium oxides (see p.9 of the technical analysis, where, under key assumptions, it is stated that "Depleted uranium would be disposed of in an oxide form. The model included the capability to look at other forms, but those capabilities were not used in the analysis.").

(Over)

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Thank you for your consideration and response. If you have any questions, please call Helge Gabert or Don Verbica at (801) 536-0200.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott T. Anderson', with a large, stylized flourish at the end.

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

STA/HG/km

c: Jeff Coombs, EHS, Health Officer, Tooele County Health Department
Bryan Slade, Environmental Health Director, Tooele County Health Department
John Tappert, NRC (Email)