

January 30, 2019

**SUNSI Review Complete**  
**Template = ADM-013**  
**E-RIDS=ADM-03**  
**ADD= Lloyd Desotell,**

CD19-0026

Ms. May Ma  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-000

**COMMENT (6)**  
**PUBLICATION DATE: 12/21/2018**  
**CITATION # 83 FR 65759**

Re: Comment on Draft Revision 3 NUREG/BR-0204, "Instructions for Completing NRC's Uniform Low Level Radioactive Waste Manifest" [83FR54620; Docket ID NRC-2018-0155]

Dear Ms. Ma:


EnergySolutions is pleased to review Draft Revision 3 of NUREG/BR-0204, "*Instructions for Completing NRC's Uniform Low Level Radioactive Waste Manifest*" issued in the Federal Register on October 30, 2018 for comment by December 31, 2018. We appreciate the U.S. Nuclear Regulatory Commission (NRC) extending the comment to January 31, 2019 to allow for broader industry consideration of the proposed revision. EnergySolutions' supports the improvements considered in Revision 3 of NUREG/BR-0204 and have no specific comments to the language proposed. We understand, however, that some commenters have a desire to change the manner in which waste volumes are manifested for bulk shipments of compactible material (e.g., DAW in sealands or intermodals). As a disposal site licensee, we disagree with this proposed change for the following reasons.

First, the volume packaged for disposal should reflect the actual volume in the bulk disposal container instead of guessing or estimating what the final placement volume would be in the disposal cell. This approach is contrary to tracking actual volumes that are generated, packaged, and shipped to disposal facilities. The proposed change regarding bulk volume estimates being reported on the NRC Form 541 has no impact on the disposal site capacity since the actual waste volume in the bulk package does not change when it arrives at the disposal facility. Simply reporting a different waste volume does not change the actual volume of waste in the bulk packaged received for disposal and has no bearing on actual capacity at LLRW disposal facilities.

Second, if the data in the U.S. Department of Energy's Manifest Information Management System (MIMS) are being used to track waste volumes generated and disposed at U.S. commercial disposal facilities, then MIMS could apply a reduction factor to estimate the "post disposal displacement volume." The modified MIMS data could then be used by generators seeking to address the difference between waste volumes generated, packaged, and shipped from their facilities to the "post disposal displacement volume."

Should there be any questions with these comments, please contact me at 801-649-2000 or [VCRogers@EnergySolutions.com](mailto:VCRogers@EnergySolutions.com).

Sincerely,

 Vern C. Rogers  
Jan 30 2019 8:39 AM

The cosign logo, consisting of the word "cosign" in a lowercase, sans-serif font with a red dot over the 'i'.

Vern C. Rogers  
Director, OWM Regulatory Affairs