

SJ/MEMOBERN

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MEMORANDUM FOR: Robert M. Bernero, Director
Office of Nuclear Material Safety
and Safeguards

NOV 20 1990

FROM: Richard L. Bangart, Director
Division of Low-Level Waste Management
and Decommissioning
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF THE OCTOBER 18, 1990, MEETING WITH BROWNING-FERRIS
INDUSTRIES (BFI) AND FOLLOW-UP ACTIONS

Enclosed is a summary of the October 18, 1990, meeting with BFI for your information. Also, as part of the meeting summary, I have included a discussion of conclusions and follow-up actions.

The meeting was held to discuss several waste management issues common to both the Nuclear Regulatory Commission (NRC) and BFI. The Low-Level Waste Management (LLWM) staff intends to address the issue regarding hospitals inadvertently disposing of radioactive materials at landfills and medical waste treatment facilities via an Information Notice.

In addition, LLWM is preparing a list of issues related to the management of medical waste. I will submit this list of issues to you in the near future.

If you have any questions, please call me at X-22340 or Samuel Z. Jones of my staff at X-20554.

(SIGNED) RICHARD L. BANGART

Richard L. Bangart, Director
Division of Low-Level Waste Management
and Decommissioning
Office of Nuclear Material Safety
and Safeguards

Enclosures: As stated

Distribution:	Central File#	NMSS r/f	LLRB r/f	SJones
RBoyle	JAustin	JGreeves	RBangart	LLWM r/f
PLohaus	JJSurmeier			
PDR YES	<input checked="" type="checkbox"/> NO	Category: Proprietary ___ or CF Only ___		
ACNW YES	<input checked="" type="checkbox"/> NO			

SUBJECT ABSTRACT: MEETING SUMMARY WITH BFI

*SEE PREVIOUS CONCURRENCE

OFC :LLRB*	:LLRB	:LLRB*	:LLWM	:LLWM	:
NAME:SJones/es	:RBoyle	:JAustin	:JGreeves	:RBangart	:
DATE:11/27/90	:XXXXXXXXXX	:11/28/90	:11/27/90	:11/27/90	:

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ENCLOSURE

SUMMARY OF THE OCTOBER 18, 1990, MEETING WITH
BROWNING-FERRIS INDUSTRIES (BFI)

Date: October 18, 1990

Place: U.S. Nuclear Regulatory Commission (NRC), OWFN

Purpose: To provide a forum for the exchange of information on several waste management topics. These topics included: the detection of radioactive material in waste shipments being sent to landfills and medical waste management facilities; waste disposal exemptions and practices; below regulatory concern waste, hazardous waste management; and decontamination and decommissioning wastes.

Participants:

	NRC	BFI
	R. Bernero	R. Fonner
	R. Bangart	J. Cunningham
	J. Austin	D. Cool
	R. Boyle	R. Meck
	W. Lahs	S. Jones
	L. Camper	N. Orlando
	J. Hickey	A. Huffert
	J. Lubenau	
	and other interested staff members	

Discussion: The meeting began with a presentation by Mr. Joel Lubenau, from the Office of Governmental and Public Affairs (GPA), describing the efforts by the scrap metal industry in monitoring for radioactive materials. At the conclusion of Mr. Lubenau's presentation, the meeting generally followed the agenda (Attached).

I. FOLLOW-UP DISCUSSION OF THE SEPTEMBER 5, 1990, MEETING AND ON-SITE VISIT WITH BFI IN ILLINOIS

BFI described their monitoring system as a sodium iodide scintillation detection system which surveys incoming waste shipments at landfills. Incoming vehicles which have detectable levels of radiation measuring 400 cpm above background are rejected and the state agency may be notified. The lower threshold of the BFI monitoring system is 200 kev. BFI believes that the system can detect activities as low as 50 microcuries.

BFI stated that radioactive wastes which have been determined to be below regulatory concern (BRC) would be accepted by BFI. However, BFI may want prior notification of incoming BRC waste shipments and would manage BRC waste as a "special waste". BFI may require that BRC waste be disposed in a separate excavation at the landfill.

BFI noted that, in California, a landfill has set the trigger levels for incoming shipments at 50,000 cpm.

BFI operates 107 landfills. Approximately 90 of the sites have installed or are in the process of installing detection systems.

CONCLUSIONS AND RECOMMENDATIONS:

In regard to waste shipments received by BFI which measure detectable level of radioactivity, the NRC is evaluating this matter. In regard to the BFI monitoring system, NRC noted that the 200 kev threshold for the detection system would not detect certain important radionuclides such as 99m-Techneium and 125-Iodine.

In regard to BRC waste, the NRC would not require any special management of the wastes (ie., special disposal areas or special manifests).

In regard to the differences in trigger levels for rejection of incoming waste shipments, the NRC is also evaluating this matter.

II. EXISTING EXEMPTIONS, POLICIES AND PRACTICES

The NRC staff discussed some of NRC's exemptions, policies and practices.

BFI stated that landfills have detected radioactive materials in waste shipments from hospitals. BFI has noticed a reduction in the number of waste shipments containing detectable levels of radioactivity after the waste shipments were returned to the hospital.

NRC stated that patients administered radiopharmaceuticals having a residual activity of less than 30 millicuries are not required to be hospitalized.

CONCLUSIONS AND RECOMMENDATIONS:

The Division of Low-Level Waste Management (LLWM) recommends that an information notice should be sent to all NRC medical use licensees to: (1) inform them that some landfills and medical waste treatment facilities are monitoring and detecting radioactive materials in waste received from hospitals; and (2) encourage medical use

licensees to review their waste management programs to ensure that radioactive materials do not inadvertently get into the hospital's nonradioactive waste.

In addition, LLWM is planning a conference call with the Division of Industrial Medical Nuclear Safety (IMNS) and the regional offices to discuss issues related to medical waste management.

III. DISCUSSION OF THE NRC BRC POLICY

NRC summarized the BRC policy and recent NRC activities to explain the policy to the public through a series of public meetings.

NRC pointed out that the BRC policy, by itself, does not specify types of wastes and the levels of radioactivity which would comply with the policy's provisions. Implementation of the BRC policy would occur primarily through the rulemaking process or licensing actions and may be subject to public input and comment.

CONCLUSIONS AND RECOMMENDATIONS:

None

IV. DISCUSSION OF HAZARDOUS WASTE MANAGEMENT

BFI discussed their experiences in hazardous waste management and have decided to discontinue involvement in this area.

CONCLUSIONS AND RECOMMENDATIONS:

None

V. DISCUSSION OF DECOMMISSIONING AND DECONTAMINATION WASTES

BFI stated that decontamination and decommissioning wastes would be managed in a similar manner as low-level radioactive wastes which were determined to be BRC.

CONCLUSIONS AND RECOMMENDATIONS:

None

*** MEETING NOTICE ***

MEETING WITH BROWNING-FERRIS INDUSTRIES

DATE: THURSDAY OCTOBER 19, 1990

TIME: 10:00 TO 12:00

PLACE: USNRC - OWPN
ROOM 6 B 11

BACKGROUND: SANITARY LANDFILLS AND MEDICAL WASTE TREATMENT FACILITIES ARE DETECTING RADIOACTIVE MATERIALS IN WASTE SHIPMENTS TO BE MANAGED AS NON-RADIOACTIVE MATERIAL.

- PURPOSE:
1. FOLLOW-UP DISCUSSION OF THE SEPTEMBER 12, 1990 MEETING AND ON-SITE VISIT
 - DISCUSSION OF THE VARIOUS TRIGGER LEVELS THAT ARE BEING USED TO DETECT RADIOACTIVE MATERIALS IN WASTE SHIPMENTS (IE: 400 CPM VS. 50,000 CPM)
 - COMPARISON OF NRC REGULATIONS AND POLICIES WITH THOSE OF THE AGREEMENT STATES (IE: TEXAS AND CALIFORNIA) REGARDING THE MANAGEMENT OF RADIOACTIVE MATERIALS DETECTED AT SANITARY LANDFILLS AND MEDICAL WASTE TREATMENT FACILITIES
 2. EXISTING EXEMPTION POLICY AND PRACTICES
 3. DISCUSSION OF THE NRC BRC POLICY
 - NRC'S ASSESSMENT OF THE DIRECTION AND IMPLEMENTATION OF THE BRC POLICY
 - NRC'S ASSESSMENT OF THE TYPES OF WASTE AND THE LEVELS OF RADIOACTIVITY THAT BRC WASTE MAY EXHIBIT BEFORE BEING SENT TO SANITARY LANDFILLS AND MEDICAL WASTE TREATMENT FACILITIES
 4. DISCUSSION OF HAZARDOUS WASTE MANAGEMENT
 - TECHNICAL REQUIREMENTS FOR RCRA SITES
 5. DISCUSSION OF NRC'S DECONTAMINATION AND DECOMMISSIONING POLICY
 - CRITERIA FOR DETERMINING ACCEPTABLE LEVELS OF RESIDUAL CONTAMINATION THAT COULD BE DISPOSED AT A SANITARY LANDFILL
 - ESTIMATION OF THE TYPES OF WASTE AND THE LEVELS OF RADIOACTIVITY THAT MAY BE SENT TO SANITARY LANDFILLS FROM DECONTAMINATION AND DECOMMISSIONING ACTIVITIES

INVITED

ATTENDEES:

ROBERT BERNERO, NRC	VANDY MILLER, NRC	BRUCE GANTER, BFI
RICHARD BANGART, NRC	JOHN GREEVES, NRC	JOHN GREENBERG, BFI
FRANK CONGEL, NRC	JAY CUNNINGHAM, NRC	MARSHA WILLIAMS, BFI
RICHARD CUNNINGHAM, NRC	JOHN AUSTIN, NRC	JOHN GLENN, NRC
JOHN HICKEY, NRC	DONALD COOL, NRC	ROY CANIANO, NRC
REGIS BOYLE, NRC	BILL LAHS, NRC	SAM JONES, NRC

CONTACT: SAM JONES, NRC 301-492-0554 FTS 492-0554

SJ/MEMOBERN

MEMORANDUM FOR: Robert M. Bernero, Director
Office of Nuclear Material Safety
and Safeguards

FROM: Richard L. Bangart, Director
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NAME:SJones/es	:RBoyle	:JAustin	:JGreeves	:RBangart	:
DATE: 11/27/90	: 1/1/90	: 11/28/90	: 1/1/90	: 1/1/90	:

ROUTING AND TRANSMITTAL SLIP

DATE: November 19, 1990

	SIGN AND/OR CONCUR	DATE
1. SJones	C/ <u>A. Jones</u>	<u>11/27/90</u>
2. JAustin	C/ <u>[Signature]</u>	<u>11/28/90</u>
3. JGreeves	C/ <u>[Signature]</u>	<u>11/29/90</u>
4. FBangart	C/ <u>[Signature]</u>	<u>11/28/90</u>
5.	_____	<u>1 1</u>
6.	_____	<u>1 1</u>
7.	_____	<u>1 1</u>
8.	_____	<u>1 1</u>
9.	_____	<u>1 1</u>
10.	_____	<u>1 1</u>

ACTION:
APPROVAL:
AS REQUESTED:
COORDINATION:

CIRCULATED:
COMMENT:
NOTE & RETURN:
PER CONVERSATION:

FOR YOUR INFO:
SEE ME:
PREPARE REPLY:

TICKET NUMBER:

REMARKS:

DUE TO DIVISION:

DUE TO NMSS:

DUE TO EDO:

DUE TO OCM:

Dist

MEMORANDUM FOR: Robert M. Bernero, Director, NMSS

FROM: Richard L. Bangart, Director, LLWM/NMSS

SUBJECT: MEETING SUMMARY WITH BFI

ORIGINATOR/SECRETARY: SJones
ESchultz

ROOM NO./BLDG.: 5E-4
PHONE NO.: 23342