

SAFETY EVALUATION
OF THE
"PROCEDURES FOR CERTIFICATION OF 11e.(2) MATERIAL"
DATED FEBRUARY 24, 1994
by
ENVIROCARE OF UTAH, INC

BACKGROUND

License Condition 9.6(c) of License No. SMC-1559 states:

"Prior to the initial receipt and storage of any 11e.(2) byproduct material at the site, the licensee shall:

(c) establish and obtain NRC approval of procedures to ensure that all wastes, other than 11e.(2) byproduct material, are precluded from disposal in the NRC licensed disposal site. The procedures should include obtaining, from the generator or owner of the wastes, certification by a responsible company authority, that the material is 11e.(2) byproduct material, and does not contain other radioactive waste or hazardous waste. The certification should be based on generator or owner documentation of the source or origin of the waste. The certification should also include documentation as to the non-radiological constituents in the waste."

On January 14, 1994, Envirocare of Utah, Inc., (Envirocare) originally submitted its certification procedures for NRC review and approval. NRC staff reviewed the document and requested additional information in a letter dated February 24, 1994. On March 8, 1994, Envirocare submitted a revised document for review and approval. The NRC staff review of the certification procedures is addressed in the following sections.

NRC STAFF REVIEW

By letter dated March 8, 1994, Envirocare proposed a "Procedure For Certification of 11e.(2) Material." The procedure requires the owner or generator of the waste to execute a certification by a responsible company official documenting that the waste is 11e.(2) byproduct material and identifying its radiological and non-radiological constituents. It requires Envirocare to obtain the certification before acceptance of waste and to verify that each shipment of waste is also certified consistent with the general certification. The procedure requires Envirocare to review the certification and to verify, by independent means, the validity of the 11e.(2) designation and of the chemical and radiological characterization of the waste.

NRC staff has reviewed the information in the procedure and concludes that the procedure will ensure that wastes other than 11e.(2) byproduct material are precluded from disposal in the NRC licensed disposal site. The procedure also will ensure documentation of the constituents in the waste.

These procedures should be included in Envirocare's Standard Operating Procedures for the NRC licensed facility. The issue of disposal of waste

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other than 11e.(2) byproduct material and the characterization of constituents in the waste could be of concern at the time of license termination and transfer to the long-term custodian of the site. Therefore, Envirocare should maintain the certifications and verifications in accordance with 10 CFR Part 61, Subpart G, Section 61.80 (e).

CONCLUSION

As a result of the above evaluation, the NRC staff has concluded that certification procedure as described in Envirocare of Utah, Inc's "Procedures for Certification of 11e.(2) Material" is acceptable. Therefore, the licensee's plan is approved and the requirements of License Condition 9.6(c) have been met.