



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

September 29, 2020

MEMORANDUM TO: Stephen Koenick, Chief  
Low-Level Waste and Projects Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

FROM: Lloyd Desotell, Project Manager Lloyd T. Desotell Digitally signed by Lloyd T. Desotell  
Date: 2020.09.29 08:01:52 -0400  
Low-Level Waste and Projects Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: SUMMARY OF SEPTEMBER 14, 2020, TELECONFERENCE  
REGARDING THE IMPLEMENTATION STATUS OF  
NUREG/BR-0204 REVISION 3 AND ASSOCIATED NRC FORMS

On September 14, 2020, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public teleconference where the NRC staff provided industry representatives, licensees, and vendors a status update regarding the implementation of NUREG/BR-0204, Revision 3, and the associated revisions to NRC Forms 540, 541 and 542.

The teleconference was noticed on the NRC's public Web site on August 31, 2020, and the notice and meeting agenda is available in the NRC's Agencywide Documents Access and Management System at Accession No. ML20244A327.

During this teleconference NRC staff stated that it had received several requests to delay implementation of the revisions to NRC forms 540, 541 and 542 associated with NUREG/BR-0204, "Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest," Revision 3. NRC staff stated that in response to those requests as well as other considerations, the NRC has decided to delay the implementation of NUREG/BR-0204, Revision 3 until further notice and is currently in the process of changing NRC Forms 540, 541 and 542 back to the January 2020 versions, which may take one month to complete. NRC staff noted that in the interim, based on the definitions section of Appendix G to 10 CFR Part 20, licensees need not use originals of the NRC uniform waste manifest forms as long as any substitute forms are equivalent to the original documentation in respect to content, clarity, size, and location of information. NRC staff also noted it would issue a *Federal Register* Notice to this effect. This *Federal Register* Notice is scheduled to publish on September 30, 2020.

CONTACT: Lloyd Desotell, NMSS/DUWP  
301-415-5969

No comments from members of industry were offered when NRC staff asked if there would be a burden to industry if NRC delayed implementation of NUREG/BR, Revision 3. NRC staff noted that they wanted to ensure that there were no unintended consequences if the implementation of the revisions to NRC forms 540, 541 and 542 associated with NUREG/BR-0204, Revision 3 was delayed.

Several commenters stated their desire to delay implementation of the forms associated with NUREG/BR-0204, Rev. 3 until March 31, 2021.

The NRC staff did not commit to a specific timeframe for implementation of NUREG/BR-0204 Revision 3 rather they stated they plan to have a meeting to discuss future implementation of NUREG/BR-0204, Revision 3.

No comments from members of the public or state regulators were offered when requested before the end of the meeting.

Enclosure:  
List of Attendees

SUBJECT: SUMMARY OF SEPTEMBER 14, 2020 TELECONFERENCE REGARDING THE  
IMPEMENTATION STATUS OF NUREG/BR-0240 REVISION 3 AND ASSOCIATED  
NRC FORMS DATE: September 29, 2020

DISTRIBUTION:

Karen Pinkston	David Garmon	Bo Pham	James Adler
Lloyd Desotell	Patricia Holahan	Bill Rautzen	Stephen Koenick
Kathy Modes	Cynthia Jones	David Pstrak	Don Lowman
Camille Levine	Jason Draper	Chris McKenney	Adam Schwartzman
LLW LISTSERV			

ADAMS Accession No.: ML20268C223

<b>OFFICE</b>	DUWP/LLWPB	DUWP/LLWPB
<b>NAME</b>	LDesotell	SKoenick
<b>DATE</b>	9/28/20	9/29/20

**OFFICIAL RECORD COPY**

## **Attendee List**

### **NRC**

Adam Schwartzman  
Patricia Holahan  
Karen Pinkston  
Chris McKenney  
Stephen Koenick  
Lloyd Desotell  
Bo Pham  
James Adler  
David Pstrak  
Robert Gladney  
Don Lowman  
Kathy Modes  
David Garmon  
Bill Rautzen  
Cynthia Jones  
Camille Levine  
Jason Draper

### **State Regulators**

Rich Janati  
Lisa Bruedigan  
Eric Skotak  
Rusty Lundberg  
Earl Fordham  
Cheryl Rogers  
Gregorio Rosado  
Kristen Schwab

### **Members of Industry/Public**

Heather Sulliva  
Steven Berger  
Cameron Pelzer  
Bret Rogers  
Lee Villalobos  
Vern Rogers  
Mark Lewis  
Jason Jones  
James Leonard  
Michael Wiskerchen  
Mike Cecalupo  
Rob Newton  
David Kania  
David Tolbert  
Dan Davis  
Janet Schlueter  
Daniel Shannon  
Robert Bishop

Wilson Yarbrough  
Nick Harmon  
Marc Pawlowski  
Glen Vickers  
Clint Miller  
Sandra Koss  
Greg Haught  
Dylan Long  
Philip Simpkin  
Jaime Barnes  
Wenjia Liu  
Quachel Bazile  
Michael Maier  
Fay Saremi  
Douglas Hatch  
Wm. Stetson Boyd  
George Greene  
Tiffanee Navarro  
Tyler Smith  
James Young  
Amaryl Morie  
Josie Piccone  
Sean Austin  
John Andoe  
Charles Deible  
Vincent Murphy  
Stephen Nance  
Lane Howard  
Patrick Eures  
Camille Zozula  
Tim Martinson  
Alaa Albudairi