

From: [Parrott, Jack](mailto:Parrott.Jack)
To: "June.Tierney@vermont.gov"; "Natalie.creed@deg.idaho.gov"
Cc: [Leshinskie, Anthony \(Anthony.Leshinskie@vermont.gov\)](mailto:Leshinskie.Anthony@vermont.gov); [Tiftt, Doug](mailto:Tiftt.Doug); [Watson, Bruce](mailto:Watson.Bruce); [Dimitriadis, Anthony](mailto:Dimitriadis.Anthony); [Hammann, Stephen](mailto:Hammann.Stephen); [Sheehan, Neil](mailto:Sheehan.Neil); [Maier, Bill](mailto:Maier.Bill)
Subject: Vermont Yankee request to NRC for alternate disposal of wastewater
Date: Tuesday, December 22, 2020 3:53:00 PM
Attachments: [Final draft VY 20.2002 EA-FONSI.docx](#)
[Final draft SER VY 20.2002 May 2020.docx](#)

Dear Ms. Tierney and Ms. Creed,

By letter dated May 20, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML 20157A123), NorthStar Nuclear Decommissioning Co. (NorthStar or licensee) submitted a request for NRC approval of the alternate disposal of wastewater, from the Vermont Yankee Nuclear Power Station (VY) at the U.S. Ecology Idaho (USEI) waste disposal facility, in accordance with 10 CFR 20.2002. The USEI facility is a Resource Conservation and Recovery Act Subtitle C hazardous waste disposal facility permitted by the State of Idaho. The USEI facility is not an NRC-licensed disposal facility. The NRC requested additional information on the proposed alternative disposal from NorthStar on August 21, 2020 (ADAMS Accession No. ML20237F432) to complete review of the request. On September 21, 2020, NorthStar submitted its response to the request for information (ML20290A492).

The waste included in this 20.2002 request consists of approximately 2,000,000 gallons of wastewater associated with the decommissioning of VY and contains low concentrations of fission and activation products resulting from VY dismantlement operations. The waste will be transported from VY to USEI by rail, and the water will be solidified with clay at USEI prior to disposal.

To obtain approval for 20.2002 alternate disposals, the NRC requires a licensee to demonstrate that doses will be maintained as low as reasonably achievable (ALARA). The NRC has determined that for 20.2002 alternate disposal approvals this limit requires a licensee to demonstrate that the dose to a member of the public (including all exposure groups) is no more than "a few millirem per year."

USEI also submitted a letter on May 4, 2020 (ML20174A590), requesting an exemption from the licensing requirements of 10 CFR 30.3 to allow for the transfer of the wastewater containing byproduct material to USEI and disposal of the byproduct material at the USEI facility. Specific exemptions to the licensing requirements of 10 CFR 30.3 are provided for under 10 CFR 30.11. When evaluating 10 CFR 30.11 exemption requests in conjunction with 20.2002 alternative disposal requests, the NRC has applied a similar standard to both reviews. As discussed above, the NRC applies a dose standard of "not more than a few millirem per year" to any member of the public to its 20.2002 alternate disposal reviews.

Our internal guidance on processing such requests indicates that as part of enhanced outreach we send a draft of the final EA and SER to the State where the disposal will take place, as well as the State where the licensee is located, for a 30-day comment period.

Please see the attached final drafts of the NRC EA and SER for your review and let me know if you have any questions.

Sincerely,

Jack D. Parrott
Senior Project Manager
US Nuclear Regulatory Commission
301-415-6634