



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

March 3, 2021

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: Priya Yadav, Project Manager  
Low-Level Waste and Projects Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

A handwritten signature in black ink that reads "Priya Yadav".

Signed by Yadav, Priya  
on 03/03/21

SUBJECT: SUMMARY OF FEBRUARY 11, 2021, TELECONFERENCE  
REGARDING THE IMPLEMENTATION STATUS OF  
NUREG/BR-0204 REVISION 3 AND ASSOCIATED NRC FORMS

On February 11, 2021, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public teleconference where the NRC staff provided industry representatives, licensees, waste generators, and vendors a status update regarding the implementation of NUREG/BR-0204, "Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest, Rev. 3," and the associated revisions to the Uniform Waste Manifest (UWM) Forms (NRC Forms 540, 541 and 542).

The teleconference was noticed on the NRC's public website on January 19, 2021, and the notice and meeting agenda is available in the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21035A351. The NRC staff's presentation is available in ADAMS at Accession No. ML21039A763.

During this teleconference NRC staff provided background and a summary of the changes that were made to the guidance document and the UWM forms between Revision 3 and Revision 2. NRC staff also provided examples and answered questions on how to implement the guidance relating to the use of data flags, scaling factors, and lower limit of detection (LLD) values in waste classification calculations.

NRC staff stated that no additional changes would be made to the UWM forms or the guidance instructions beyond what was published in June 2020, prior to the delay of implementation that industry requested and that NRC announced in a September 30, 2020 *Federal Register* Notice (85 FR 61576).

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Staff indicated it was seeking stakeholder feedback if industry would be ready to implement NUREG/BR-0204, Rev. 3 and the revised UWM forms by June 1, 2021, with a 90-day implementation period to allow a transition time between revisions. Several commenters stated they would be ready to complete implementation of the forms by September 1, 2021. Several other commenters discussed waste characterization challenges with respect to hard-to-detect radionuclides.

NRC staff discussed that generators may electronically reproduce the NRC version of the forms that will be posted to the NRC Forms Library, <https://www.nrc.gov/reading-rm/doc-collections/forms/index.html>, however, if they are using the NRC version of the forms they need to include the Paperwork Reduction Act (PRA) required statements such as the Office of Management and Budget Clearance number, the expiration date, and the PRA statement. NRC staff indicated that generators should check with the receiving waste disposal or waste processing facility if that facility is located in an Agreement State, as the state regulators may be maintaining their own Agreement State equivalent versions of the NRC forms (equivalent to the original documentation in respect to content, clarity, size, and location of information).

Several stakeholders asked questions about implementing the guidance in NUREG/BR-0204, with respect to data flags, generic scaling factors, and LLDs and expressed interest in further interactions with the NRC regarding LLD methodology for the hard-to-detect radionuclides. A stakeholder from the Electric Power Institute (EPRI) confirmed the status of the NRC review of the EPRI report entitled, "Development of Generic Scaling Factors for Technetium-99 and Iodine-129 in Low and Intermediate Level Waste" (dated November 2015) (ML18172A263) was on hold unless the technical research needs of the industry require that they reopen the NRC review process.

NRC staff collected questions to post answers to as Frequently Asked Questions on the NRC website <https://www.nrc.gov/waste/llw-disposal/llw-pa/llw-uwm.html>. Staff stated they plan to continue interacting with stakeholders regarding challenging issues in waste characterization such as the use of generic scaling factors and the methodology for using LLDs in waste classification calculations.

The transcript of the meeting is available at Accession No. ML21061A030. No comments were received from any state regulators in attendance.

Enclosure:  
List of Attendees

ADAMS Accession No.: ML21061A325

DISTRIBUTION:

Karen Pinkston  
Steve Garry  
Stephen Bell

Bo Pham  
Patricia Holahan  
David Pstrak

James Adler  
Ian Irvin  
Brenda Miles

Aida Rivera-Varona  
David Cullison  
Chris McKenney

**Attendee List**

**NRC**

Patricia Holahan  
Karen Pinkston  
Christopher McKenney  
Stephen Koenick  
Priya Yadav  
Ian Irvin  
Aida Rivera-Varona  
Marlayna Doell  
Steven Garry  
Stephen Bell  
Adam Schwartzman  
Micheal Smith  
Cynthia Barr  
Rhex Edwards  
Kim Conway  
Mike Kunowski  
Allegra Chilstrom (court reporter)

**Regulators**

Jalynn Knudsen  
Phil Klevorick  
Gregorio Rosado

**Members of Industry/Public**

|                    |                    |
|--------------------|--------------------|
| Cameron Pelzer     | Coleman Miller     |
| Tommy Courtemanche | Daniel Shannon     |
| Heather Sullivan   | Amaryl Morie       |
| Thomas Kalinowski  | Ronnie Olson       |
| Jeff Ginsburg      | Marc Pawlowski     |
| Sherry Frenette    | Amanda Spalding    |
| David Kania        | Sandra Koss        |
| Chris Shaw         | Mike Casey         |
| Michael Wiskerchen | Dylan Long         |
| Bret Rogers        | Greg Haught        |
| Vern Rogers        | Colt Greer         |
| Keri Gonzalez      | Diane D'Arrigo     |
| Thaddeus Mountain  | Martin Karr        |
| Mike Cecalupo      | Voshihiko Horikawa |
| Ryan Grudzien      | Janet Aremu-Cole   |
| Kurt Fogleman      | Tim Martinson      |
| James Leonard      | Kay Cumbow         |
| Janet Schlueter    | Abhijit Sengupta   |
| Karen Kim-Stevens  | William Doolittle  |
| Glen Vickers       |                    |

Enclosure