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64FR 50778
Sept. 20, 1999

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DEPARTMENT OF HEALTH
DIVISION OF RADIATION PROTECTION

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RULES & DIR. BRANCH
US NRC

October 7, 1999

David L. Meyer, Chief
Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Meyer:

This is in response to the request for comment on the Proposed Compatibility Designation Change and Draft Emplacement Criticality Guidance for Low-Level Waste.

The compatibility change would require states that have an operating low-level radioactive waste disposal facility, and states that will establish disposal facilities in the future, to adopt essential objectives of 10 CFR 61.16(b)(2). Essentially, this change would require licensees who receive and possess special nuclear material (SNM) to describe proposed procedures to avoid accidental criticality for storage of SNM waste prior to and after waste emplacement for disposal.

The state of Washington has placed criticality controls for SNM waste in the site operator's license. The licensee's procedures also include these controls. As noted in NUREG/CR 6626, the Richland facility has the following controls in place:

1. No single package may contain more than 100 grams of U-235, or 60 grams of U-233, or 60 grams of Pu, with the sum of fractions rule applied for combinations.
2. No single package may contain more than 15 grams or any combination of U-235, U-233, and Pu, per cubic foot of the total volume. To the extent practicable, the SNM must be uniformly distributed throughout the package.
3. During disposal, accumulations of waste packages containing SNM must be disposed so that there is a minimum of eight inches of soil or a minimum of four feet of non-SNM-bearing waste in all directions from other SNM waste

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accumulations. For purposes of the license, "accumulation" means not more than 350 grams of U-235, 200 grams of U-233, 200 grams of plutonium, or any combination thereof, such that the sum of ratios of each SNM radionuclide does not exceed unity.

If you should have any questions, please do not hesitate to contact me at (360) 236-3241.

Sincerely,

A handwritten signature in cursive script that reads "Gary Robertson". The signature is written in black ink and is positioned above the printed name.

Gary Robertson, Head
Waste Management Section

GLR:krf