


Policy Perspectives on Changes to the LLRW Regulatory Framework

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Selected Policy Perspectives

- **NAS Report on Low-Activity Waste (2006)**
- **LLW Forum Discussion of Issues (2006)**
- **GAO Reports on LLRW (2004-2007)**
- **NRC LLRW Strategic Assessment (2007)**
- **NGA Position on LLRW (2008)**
- **NCSL Position on Radioactive Waste (2008)**
- **NRC Commission Direction to Staff (2009)**
- **Nuclear Industry LLRW Strategy (2009)**



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Improving Regulation & Management of Low-Activity Radwaste (NAS 2006)

- Risk-informed regulation through integrated strategies in incremental steps
- Improve efforts to gain knowledge and input from stakeholders
- Harmonize regulations for consistent control based on hazard, not origin
- Greater consideration of international consensus standards



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Discussion of Issues (LLW Forum 2006)

- Commercial LLRW is currently well regulated and managed safely
- States and compacts should continue to work with generators to ensure that disposal access remains available in the future
- It is important to take into consideration political realities, economic consequences, and regulatory concerns
- The LLW Forum stands ready to work with stakeholders through a collaborative process



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Foreign Approaches to LLRW Management (GAO-07-221)

- Comprehensive National LLRW database
 - Include disposed and stored LLRW
 - Include sealed sources
 - Project future LLRW for planning
- Other Disposition Options
 - Central storage
 - Special disposal option for VLLRW
- Financial Assurance Requirements
- National LLRW Management Plan



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Commission Direction to Staff (NRC 2009)

- Find ways to more effectively communicate to the public risk-informed concepts related to LLRW
- Develop a list or catalog of important research that has been impacted and/or stopped because of lack of disposal options
- Propose resources to risk-inform the 10 CFR Part 61 waste classification framework
- Identify conforming legislation needed to support the rulemaking



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Nuclear Industry LLRW Strategy (NEI 2009)

- Implement safe, secure and cost-effective interim storage
- Optimize LLRW generation and processing to facilitate safe, timely and cost-effective disposal
- Support reform of LLRW regulation
- Engage waste compacts, states and federal agencies in developing and implementing an integrated, national plan for effective and reliable low-level waste management



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Nuclear Industry LLRW Management Principles


- Storage and disposal have been and will continue to be managed safely
- Timely disposal is preferable to storage
- Regulation should not unduly restrict safe LLRW management options
- States and LLRW compacts are key to enabling safe LLRW management options
- An open and competitive market best facilitates development of innovative and cost-effective options



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Specific Recommendations

- Continue to consolidate and clarify staff positions on existing requirements (for example):
 - LLRW concentration averaging & classification
 - Obtaining approval of proposed disposal procedures
 - Alternative requirements for waste classification
- Engage stakeholders in developing a technical basis for updating and reforming 10 CFR Part 61
- Update and reform 10 CFR Part 61
 - Enhance performance-based/risk-informed aspects
 - Consistency based on hazard, not origin
 - In conjunction with updating of 10 Part 20 et al



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