

LLW & Security

April 17, 2009

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Background on CORAR

- **CORAR is the Trade Association for the manufacturers and distributors of radionuclides & radiopharmaceuticals**
- **Members utilize radionuclides to produce the radiopharmaceuticals for medical diagnosis and therapy & radionuclides for life science research**

Alseres Pharmaceutical Molecular Imaging • Bracco Diagnostics, Inc. • Cell Therapeutics, Inc. • Cardinal Health, Collectar, LLC • Covidien • DRAXIMAGE • Eckert & Ziegler Isotope Products • EUSA Pharma • GE Healthcare • GlaxoSmithKline • International Isotopes Inc. • Lantheus Medical Imaging • MDS Nordion • Nuclitec • Molecular Insight Pharmaceuticals, Inc. • PerkinElmer Life & Analytical Sciences, Inc. • PETNET Solutions, Inc./Siemens • QSA Global, Inc.



General Comments on LLRW

- The use of radioactive material in nuclear medicine & biomedical research needs cost effective disposal of LLRW
- Key ^3H and ^{14}C labeled research products are no longer available due to high radwaste disposal costs
- The Barnwell site is closed to generators in 36 states, making disposal of Class B, C and GTCC impossible
- The majority of our Class A waste is currently sent to *EnergySolutions*

LLRW Practices That Are Working & Should Continue

- NRC & Agreement States should continue to regulate disposal of LLRW at all disposal sites
- NRC & Agreement State regs and licensing provide for safe & secure LLRW storage, transfer, disposal & disposal monitoring
- LLRW disposal site performance should continue to be based on 25 mrem/yr and the ALARA principle

LLRW Practices That Are Working & Should Continue

- NRC-RIS 2008-12 provides practical guidelines for temporary storage
- Access to Richland site by NW and Rocky Mtn Compacts & accelerator waste should continue
- NRC should encourage Congress to continue LANL's Off-Site Source Recovery program and expand to collect smaller sources which are a potential security risk

LLRW Practices That Are Working & Should Continue

- Continue to promote the management of disused sealed sources for their recycle/reuse to minimize waste and enhance security
- Focus Group formed by GCC/SCC on Recovery & Disposition Options for disused sealed sources

LLRW & Security Concerns

- Cost of LLRW disposal is too high in 36 states due to lack of options, no free market competition, high fees & surcharges
- On-site storage of LLRW is costly – requiring regular management, additional exposure, possible license amendments & enhanced security
- Storing Class B, C & GTCC waste on-site is considered attractive target for malevolent use

CORAR Suggestions to NRC

- Industry needs access to 2-3 sites
- NRC should qualify DOE sites to accept commercial LLRW
- NRC should work with DOE to provide treatment & disposal options until cost effective commercial sites are established
- NRC should work with EPA to provide LLRW disposal access to RCRA-Subtitle C and D hazardous waste disposal sites

CORAR Suggestions to NRC

- NRC should promulgate 1 mrem/yr clearance standard for restricted and unrestricted release to avoid unnecessary use of LLRW disposal sites
- NRC should consider revising the LLRW classification system based on form rather than origin

Acronyms

CORAR - Council on Radionuclides & Radiopharmaceuticals

LLRW - Low Level Radioactive Waste

ALARA - As Low as is Reasonably Achievable

GTCC - Greater Than Class C waste

LANL - Los Alamos National Lab

NRC RIS 2008-12 - "Considerations for Extending Interim Storage of LLRW by Fuel Cycle and Materials Licensees"

GCC/SCC - Government Coordinating Council/Sector Coordinating Council

