

**MAJOR BLENDING TECHNICAL
AND POLICY ISSUES REQUIRE
RULEMAKING**

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Rulemaking Only Acceptable Solution

- WCS supports Option 2 with interim guidance removed
- Rulemaking is necessary to fully address important policy and technical issues
 - Unique waste stream under Part 61 EIS similar to DU
 - Rulemaking allows full stakeholder notice and comment for these substantial changes to long existing NRC waste disposal policies

Rulemaking Only (cont)

- Numerous technical and safety issues that require full NEPA review
- No identified health and safety issues with storage until permanent solution can be implemented (Importation to Texas Compact)
- Interim guidance could be shown to be not sufficiently protective by rulemaking

Compatibility: Need for Uniform Implementation

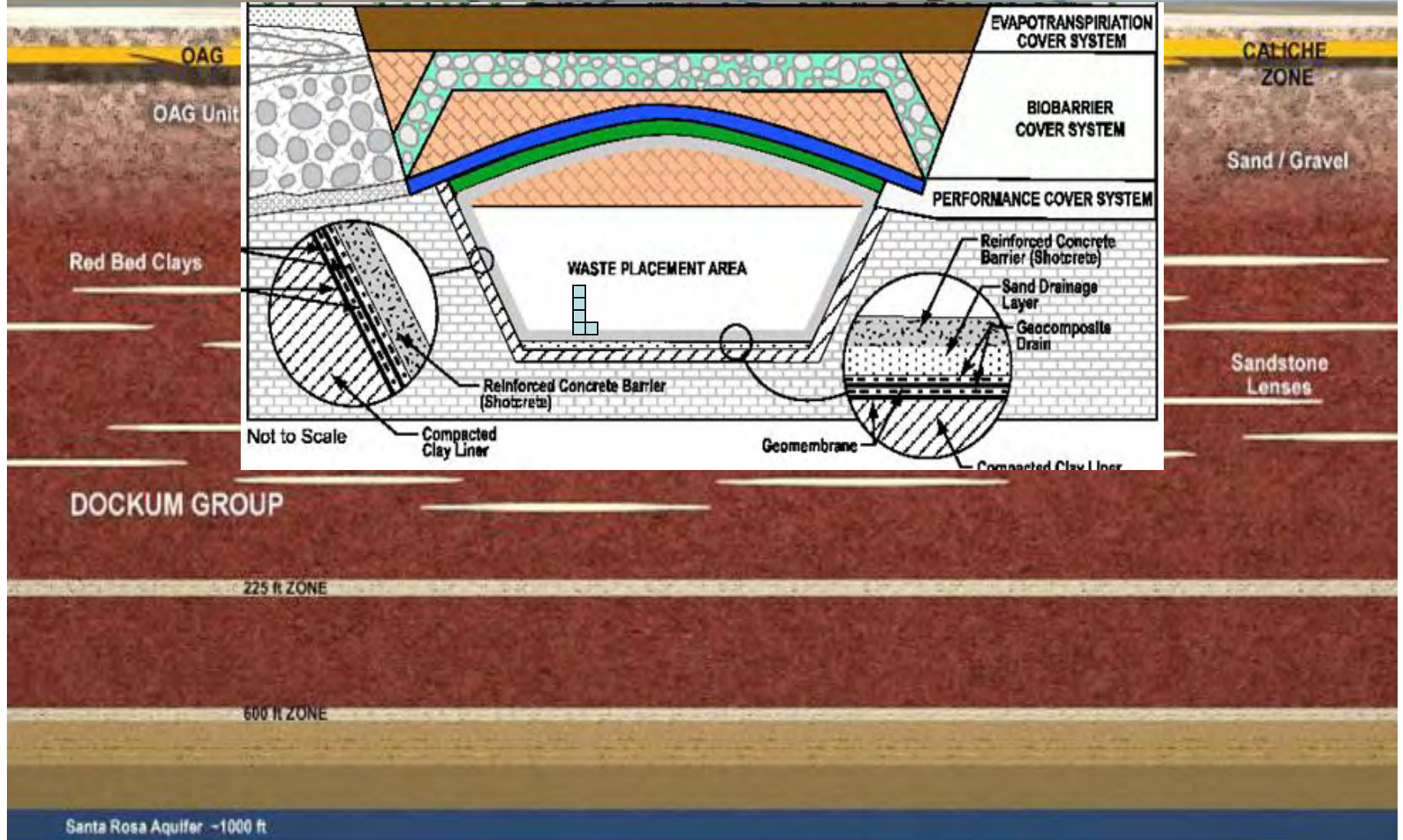
- Compatible rules only way to assure uniform implementation by states
- Texas regulations prohibit dilution of waste for purpose of changing waste class
- WCS license would require a complete reanalysis to accept waste at or near the Class C limit

Compatibility (cont)

- In Texas blended Class A waste would be classified as containerized Class A waste (Class A $>$ 100 mrem/hr) and would need to meet the same disposal requirements as Class B & C.
- WCS disposal requirements for this waste would include reinforced concrete canisters with an independent concrete barrier and a disposal depth of at least 10 meters.

PRECIPITATION
(~15 inches / yr)

EVAPOTRANSPIRATION
(65 inches / yr)



DOCKUM GROUP

225 ft ZONE

600 ft ZONE

Santa Rosa Aquifer ~1000 ft

Conclusions

- Important policy and safety issues can only be addressed by rulemaking
- Need to be uniformly implemented in Agreement States by compatible rules