

# NRC UPDATE

SPRING LLW FORUM MEETING

MARCH 22, 2023



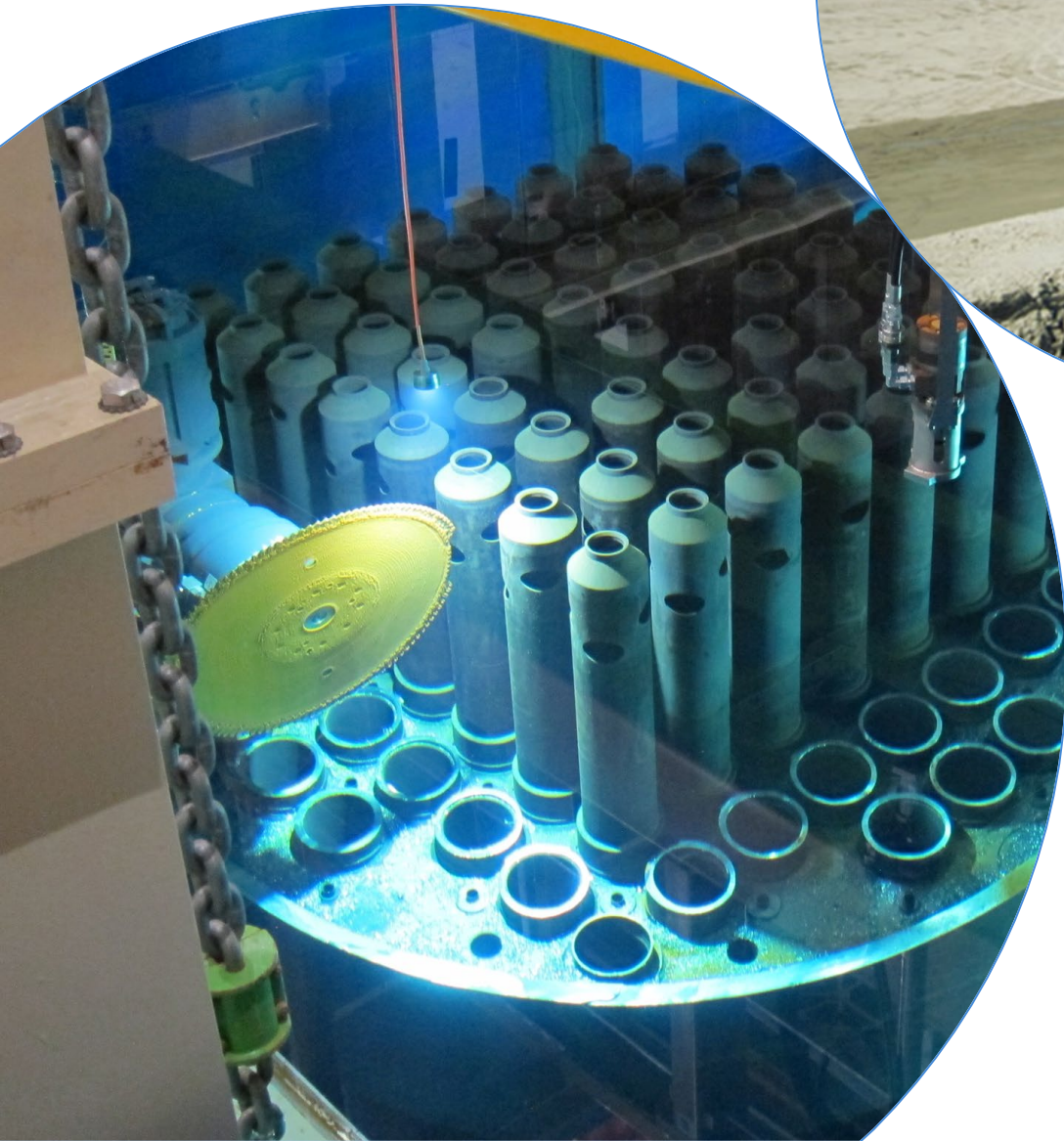
*Protecting today, tomorrow,  
and  
cleaning up the past*

Stephen Koenick, Chief  
Low-Level Waste and Projects Branch  
Division of Decommissioning, Uranium  
Recovery, and Waste Programs (DUWP)  
Office of Nuclear Material Safety and Safeguards (NMSS)

# Agenda

**Low-Level Waste  
(LLW)**

**Decommissioning**



**Recruiting and Developing a Talented Workforce to Meet NRC's Mission and Preparing for the Future**

# Focusing on Training and Knowledge Management



*NRC instructors overseeing students learning survey techniques and equipment, combined with classroom instruction, at the Technical Training Center in Tennessee*



# LLW Program

<https://www.nrc.gov/waste.html>

<https://scp.nrc.gov/llrw.html>



# Effectively Managing the LLW Program

- Completing identified tasks from programmatic assessments
  - Integrated Part 61 Rulemaking
- Providing technical support related to disposal activities
  - Alternative Disposal Requests (ADRs)
  - Uniform Waste Manifest
- Leading other efforts of our baseline LLW regulatory program
  - Participating in integrated materials performance evaluation program (IMPEP) review of Agreement States' LLW programs
  - Providing guidance on domestic and international activities on LLW management
  - Outreaching and assessing feedback
    - Different types of forums such as Agreement State workshops (first workshop held in October 2022)



# Strategically Assessing the LLW Program to Accommodate Changes



Task	Priority	Status
1. Complete and Implement Site-Specific Analysis Rulemaking	High	<b>Active</b> Integrated LLW Rulemaking – <a href="#">SRM SECY-20-0098</a>
2. Address update to the 10 CFR Part 61 Waste Classification Tables		No action-(Awaiting task 1 completion)
3. Implement the Updated Concentration Averaging and Encapsulation Branch Technical Position		Completed Training in March 2016 ( <a href="https://www.nrc.gov/waste/llw-disposal/llw-pa/llw-btp.html">https://www.nrc.gov/waste/llw-disposal/llw-pa/llw-btp.html</a> )
4. Prepare a regulatory basis and conduct potential rulemaking for Greater-Than-Class C (GTCC) and transuranic waste (TRU) disposal		<b>Active</b> Technical requirements for near surface disposal of GTCC and TRU have been integrated into the Part 61 Rulemaking – <a href="#">SRM SECY-20-0098</a>
5. Finalize internal procedure/Standard Review Plan for 10 CFR § 20.2002 requests to improve alternate disposal process		Completed ADR guidance ( <a href="https://www.nrc.gov/waste/llw-disposal/very-llw.html">https://www.nrc.gov/waste/llw-disposal/very-llw.html</a> ) (April 9, 2020)
6. Update NUREG/BR-0204, Rev. 2 (July 1998), “Instructions for Completing NRC’s Uniform Low-Level Radioactive Waste Manifest”		Completed/Published NUREG/BR-0204, Rev 3, (June 25, 2021) <a href="https://www.nrc.gov/waste/llw-disposal/llw-pa/llw-uwm.html">https://www.nrc.gov/waste/llw-disposal/llw-pa/llw-uwm.html</a>
7. Perform VLLW Scoping Study		Completed/Issued <a href="#">SECY-21-0057</a> (June 1, 2021)
8. Update and consolidate LLRW guidance into one NUREG	Medium	No Action
9. Examine the need for guidance on defining when radioactive material becomes LLW	Low	No Action
10. Develop and implement the national waste tracking system		No Action

# Completing Reviews for Safe Disposal of Very Low-Level Waste



In 2022, completed three 20.2002 reviews:

- Columbia Generating Station (request approval for onsite disposal)
  - ML22004A185 (Correction letter ML22109A092)
- Columbia Fuel Fabrication Facility (request approval for offsite disposal at US Ecology Idaho)
  - ML22054A045 and ML21208A033
- South Texas Project (request approval for offsite disposal at a landfill located within Texas (Agreement State))
  - ML22300A249 and ML22293A003

\*We assisted Region IV in the review of the Qal Tek request which could lead to future ADRs



# Integrating the LLW Rulemakings to Gain Efficiencies

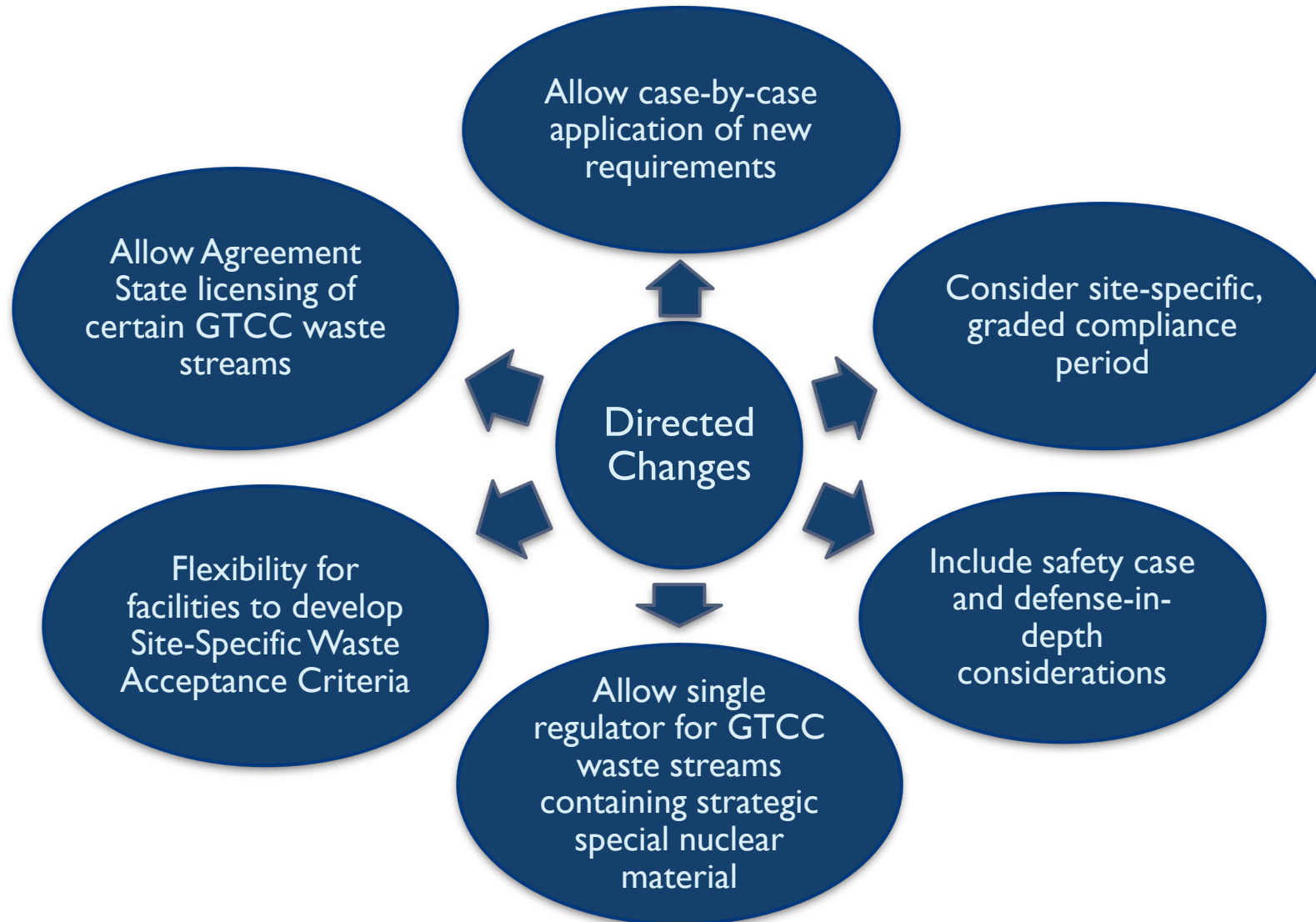
## Part 61 and GTCC/TRU Rulemakings

Staff proposed combining these efforts to address overlapping technical requirements, streamline stakeholder outreach, and gain efficiency in proceeding as one rulemaking activity (SECY-20-0098)

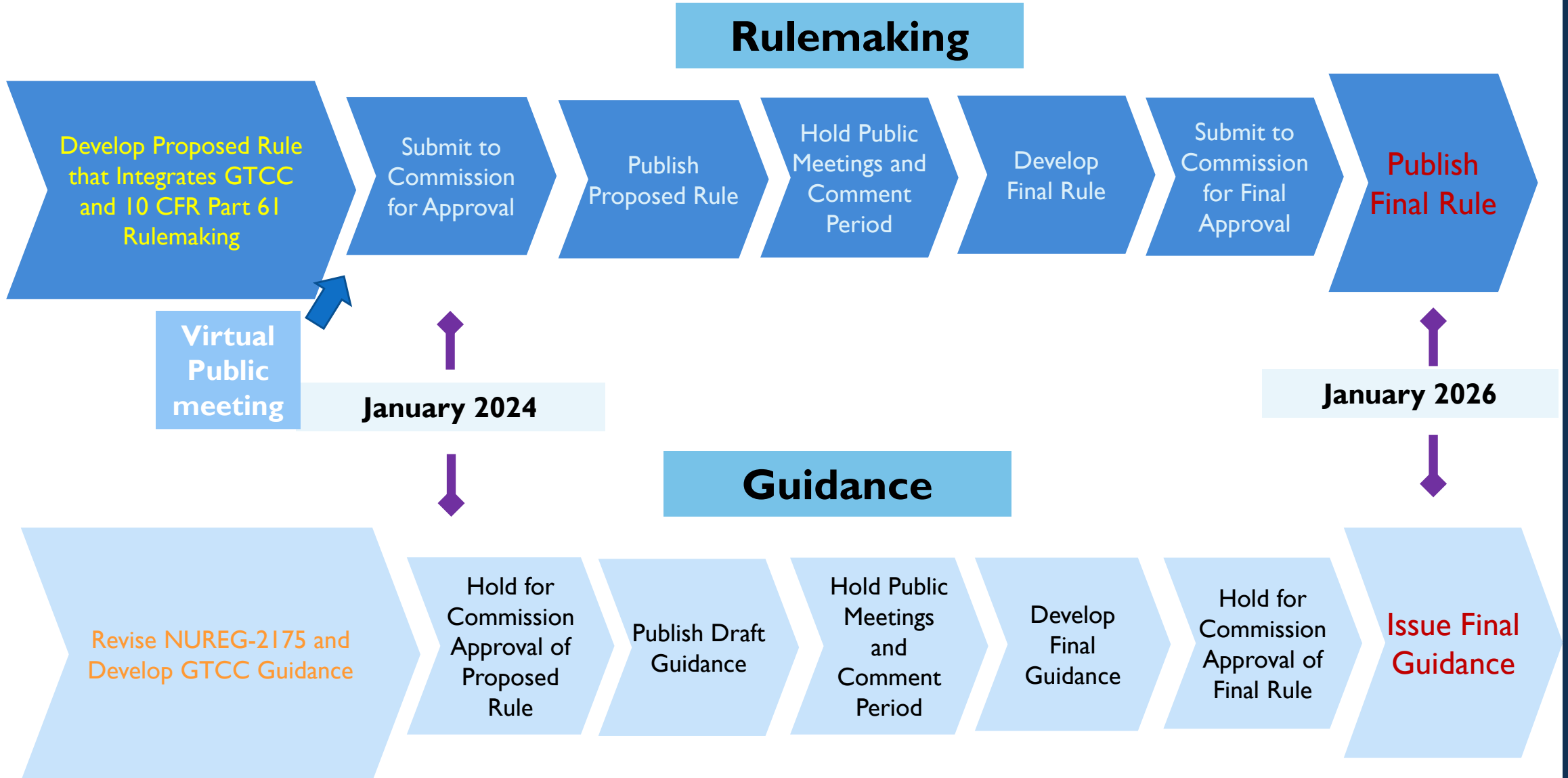
***Commission approved staff's recommendation (Staff Requirements Memorandum (SRM-SECY-20-0098)) on April 5, 2022***



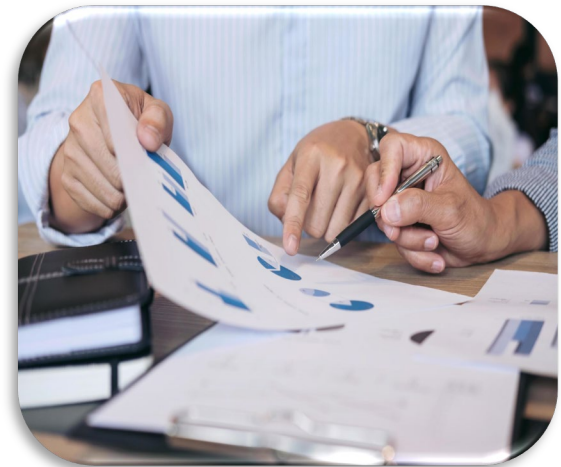
# Developing Proposed Rule Language Based on Commission Directed Changes



# Timing of Activities



## Recent Staff Activities



- Develop proposed rule language and implementing guidance
  - Numerous complexities:
    - Integration of GTCC disposal criteria
    - Agreement State regulation
    - Consider conforming changes to 10 CFR Parts 20 and 150
- Review public comments on draft GTCC Regulatory Basis
  - Plan to include staff summary responses in proposed rule Statement of Consideration
- Review public comments on 2015 Part 61 Proposed Rule
  - Responses included in SECY-16-0106
  - Comments used to inform proposed rule language for Integrated LLRWD Rulemaking

## George Tartal

*Rulemaking PM*

▪ Email:

[george.tartal@nrc.gov](mailto:george.tartal@nrc.gov)

▪ Phone: (301) 415-0016

## Cardelia Maupin

*GTCC Technical PM*

▪ Email:

[cardelia.maupin@nrc.gov](mailto:cardelia.maupin@nrc.gov)

▪ Phone: (301) 415-4127



**CONTACT US**

## Priya Yadav

*Part 61 Technical PM*

▪ Email:

[priya.yadav@nrc.gov](mailto:priya.yadav@nrc.gov)

▪ Phone: (301) 415-6667

# Decommissioning Program

<https://www.nrc.gov/waste/decommissioning/oversight.html>





## Incorporating Innovations

- Increase Data-Driven Decision-making
- Increase Risk Informing
- New Technologies Being Applied to Decommissioning

# Tracing New Paths to Decommissioning

- Accountability and Transparency Throughout the Decommissioning Process
  - Guidance
  - Licensee and Stakeholders Engagement
  - Public Outreach

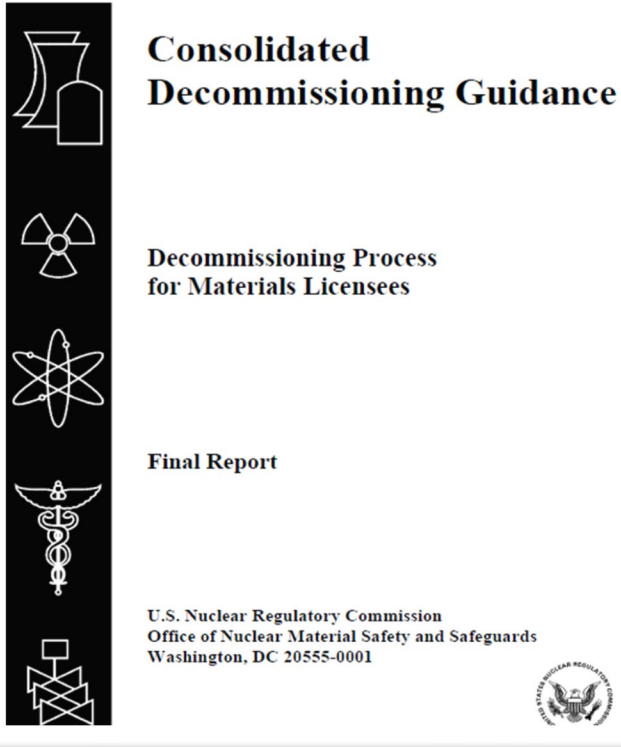




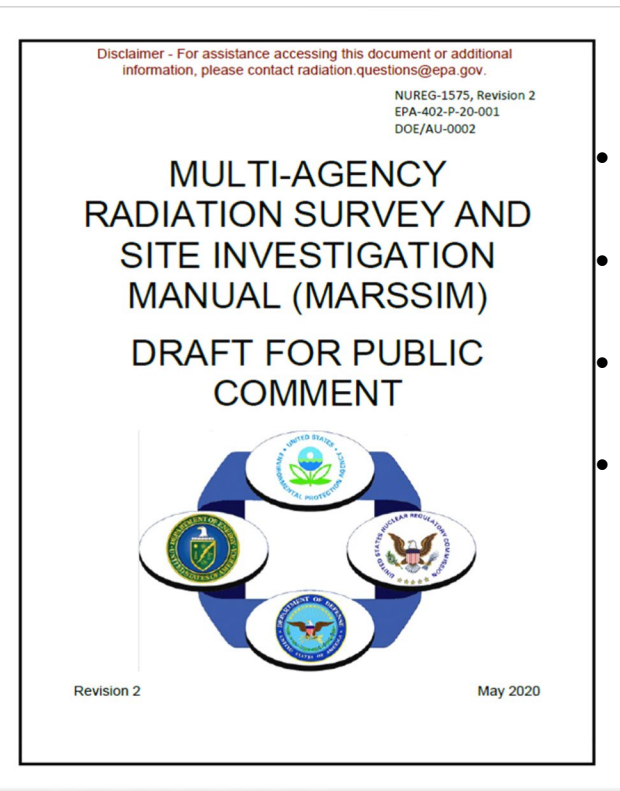
# Improving Decommissioning Process – Guidance

NUREG-1757, “Consolidated Decommissioning Guidance,” Volume 2, Rev. 2, “Characterization, Survey, and Determination of Radiological Criteria”

NUREG-1575, Rev. 2, “Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)”



- Over 200 comments in nine comment letters (ML21299A032)
- Comments addressed and final published on July 19, 2022 (ML22194A859)
- FRN was published on July 22, 2022 (87 FR 43906)



- Issued for public comment in July 2021
- Over 60 comments in 17 comment letters
- Science Advisory Board peer reviewed
- MARSSIM Working Group is currently addressing comments

**Estimated to be finalized in 2024**



## **Risk-Informed, Performance Based Decommissioning Inspection Oversight Guidance**

### **IMC 2561**

“Decommissioning Power  
Reactor Inspection Program”

### **IMC 2602**

“Decommissioning Oversight  
and Inspection Program for  
Fuel Cycle Facilities and  
Materials Licensees”

### **IMC 1248, Appendix F**

“Training Requirements and  
Qualification Journal for  
Decommissioning Inspectors”

# Decommissioning Rulemaking Update



• Would implement specific regulatory requirements for different phases of the decommissioning process consistent with the reduced radiological risk. Topics include:

- Emergency Preparedness
- Decommissioning Funding Assurance
- Environmental Considerations
- Spent Fuel Management Planning
- Record Retention Requirements

• Target date for submitting the draft final rule to the Commission is **October 2023**

- Proposed rule published on March 3, 2022 ([87 FR 12254](https://www.federalregister.gov/documents/2022/03/03/12254-01))
- Comment period closed on August 30, 2022

# Enhancing Decommissioning Outreach

What's new

New Webpage on NRC.GOV

Keep Up-to-Date on Upcoming Workshops and Guidance Releases

The screenshot shows the NRC website's navigation and content. At the top, there is a header with the NRC logo and tagline "Protecting People and the Environment". A navigation bar includes links for "NUCLEAR REACTORS", "NUCLEAR MATERIALS", "RADIOACTIVE WASTE", "NUCLEAR SECURITY", "PUBLIC MEETINGS & INVOLVEMENT", "NRC LIBRARY", and "ABOUT NRC". A search bar and a "REPORT A SAFETY CONCERN" button are also visible. The main content area features a breadcrumb trail: "Home > Radioactive Waste > Decommissioning". A left sidebar contains a "Navigation" menu with categories like "Regulations, Guidance, and Communications", "Process", "Financial Assurance", "Oversight of Materials and Reactor Decommissioning", "Public Involvement in Decommissioning", "Program Documents", "International Aspects", and "Lessons Learned". The main content area is titled "What's New in Decommissioning of Nuclear Facilities" and includes a section "On this page:" with links to "Recent and Upcoming meetings and activities", "Interim Guidance Development", and "Lessons Learned". Below this is a section titled "Recent and Upcoming Meetings and Activities" with a paragraph of text and several hyperlinks to NUREG documents.

<https://www.nrc.gov/waste/decommissioning/whats-new.html>

# **Leveraging the use of Technology and Data into Licensing and Oversight Programs**

# Questions/Comments



Follow @NRCgov



To subscribe to e-mail updates:  
[https://www.nrc.gov/public-  
involve/listserver.html#lyris](https://www.nrc.gov/public-involve/listserver.html#lyris)