

**From:** <Vicki\_Hull@Dom.com>  
**To:** <nrcprep@nrc.gov>  
**Date:** Wed, Feb 15, 2006 10:11 AM  
**Subject:** Comments on Radiation Source Protection and Security Task Force

Attached are Dominion's comments on the above subject.

(See attached file: GL06-002response.pdf)

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See = M. Hersh (MLH1)

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**Subject:** Comments on Radiation Source Protection and Security Task Force  
**Creation Date:** Wed, Feb 15, 2006 10:09 AM  
**From:** <Vicki\_Hull@Dom.com>

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February 13, 2006

Chief, Rules and Directives Branch  
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GL 06-002

**COMMENTS ON RADIATION SOURCE PROTECTION AND  
SECURITY TASK FORCE: REQUEST FOR PUBLIC COMMENT  
(FEDERAL REGISTER, VOLUME 71, NUMBER 7,  
PAGES 1776-1780, DATED JANUARY 11, 2006) (RSPS-TF)**

Virginia Electric and Power Company (Dominion) appreciates the opportunity to provide comments on the topics being considered by the Radiation Source Protection and Security Task Force, as described in the subject *Federal Register* notice.

*Topic 5. A national system to provide for the proper disposal of radiation sources.* The Task Force recognizes the importance of the need for the proper disposal of radiation sources. One of the best physical securities for a radiation source is the final disposal at a licensed facility. In the development of recommendations, the Task Force needs to address the issue associated with the limited ability to dispose of radiation sources at the existing commercial disposal sites. There are only three commercial disposal sites currently operating:

- Barnwell, S.C. accepts all classes of Low-Level Radioactive Waste (LLRW), but state actions will result in loss of access by 2008
- Hanford, Washington accepts Northwest and Rocky Mountain Compact LLRW only
- Envirocare, Utah accepts low activity (Class A) waste only

Formation of interstate compacts, as a result of Congressional Legislation passed in 1980 and amended in 1985, have not resulted in the opening of any new low level radioactive waste (LLRW) disposal facilities. This concern is discussed in GAO-04-604, "Report to the Chairman, Committee on Energy and Natural Resources, U. S. Senate, Low-Level Radioactive Wastes, Disposal Availability Adequate in the Short Term, but Oversight Needed to Identify Any Future Shortfalls."

If you would like further information, please contact either:

Lee Thomasson      Lee Thomasson@dom.com or (804) 273-3066 or

Don Olson            Don Olson@dom.com or (804) 273-2830

Respectfully,

A handwritten signature in black ink, appearing to read 'CLF', followed by a horizontal line.

C. L. Funderburk, Director  
Nuclear Licensing & Operations Support  
Dominion Resources Services, Inc. for  
Virginia Electric and Power Company