



NRC LLW Strategic Assessment

A Presentation to the Nuclear Energy Institute

September 11, 2007

**Larry W. Camper, Director
Division of Waste Management and Environmental Protection**

301-415-7437

LWC@nrc.gov

Background/Recent History

- September 1996 Strategic Assessment Issue Paper
- March 1997 Commission Direction to Staff: Maintain LLW Program at Current Level (5-10 FTE)
- Current (2007) Program: ~ 5 FTE, primarily focused on maintenance tasks

Current LLW Program Scope

- **Baseline LLW Workload**
 - Import/export licensing support
 - Support to Regions, other NRC Offices
 - Technical assistance to Agreement States
 - Support to International LLW community
 - Support to other programs/agencies/external stakeholders
 - Integrated Materials Performance Evaluation Program reviews
 - Maintaining awareness of national LLW program activities
- **Specific Technical/Regulatory Issues**
 - Disposal options for DU
 - Updating guidance on long-term storage
- **Unplanned, But Unavoidable, Demands**

NRC LLW Program

External

Congress

GAO

NAS

Industry

States

International

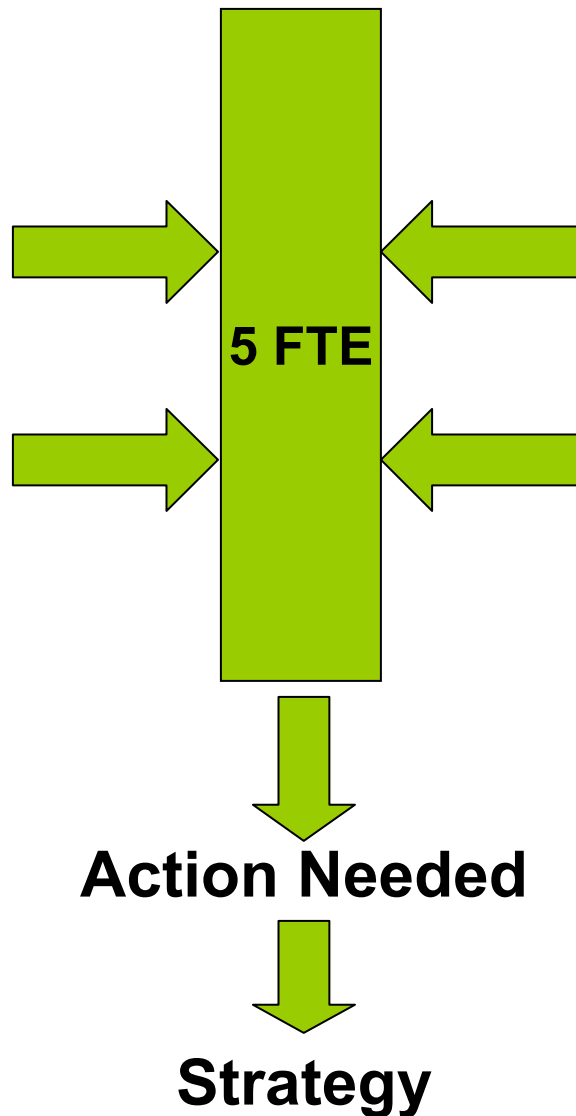
Other

Internal

Commission

ACNW

**Other NRC
Programs**



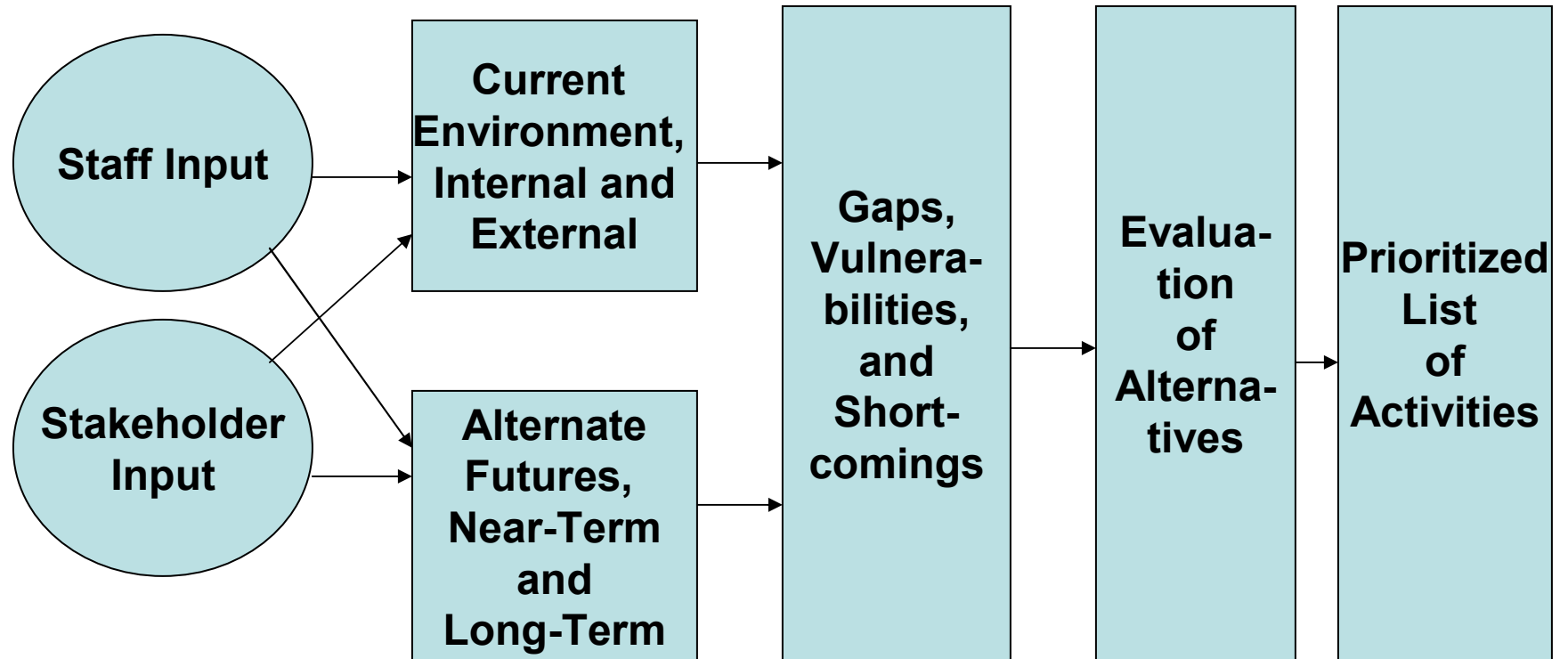
LLW Strategic Assessment Approach

- **Define Objectives**
- **Scope the Issues**
- **Gather Stakeholder Input**
- **Factor in Future needs**
- **Identify Potential NRC Actions**
- **Prioritize**
- **Develop Implementation Plan**

Objectives of Strategic Assessment

- **Position the LLW program to meet current and future challenges**
 - Ensure safe and secure disposal
 - Promote a reliable, stable, and adaptable regulatory framework
 - Address any gaps/vulnerabilities
- **Ensure limited resources are used effectively**

Process



Stakeholder Input

- **ACNW Workshop May 23-24, 2006**
- **Federal Register Notice, July 7, 2006**
- **Broad Categories of Stakeholders**
 - States
 - U.S. Military
 - Compact Commissions
 - Industry Groups/Trade Associations
 - Professional Societies
 - Environmental/Public Interest Groups
- **Specific Input**
 - Recent (03/06) NAS Report on LAW
 - ACNW White Paper and Letter Report
 - Supplemental Interactions with States
 - Various Position Papers

Examples of Current Issues in National LLW Program

- **Consideration of major changes**
 - GAO, NAS, HPS, ANS
 - Establish risk-based rather than origin-based system
 - Revise/rescind LLRWPA
- **Future widespread storage of B/C waste**
 - Barnwell closure to out-of-compact generators in mid-2008. Thirty six states affected.
- **Efforts to mitigate limited disposal availability by industry**
 - Risk-inform waste classification
 - Increase use of RCRA facilities, using 10 CFR 20.2002
 - Blending
 - Other

Proposed Activities

- **Total of 20 Activities Ranked as “High,” “Medium,” or “Low”**
- **At all levels of NAS Model**
- **7 Activities Ranked as “High”**
- **Basis/Rationales Provided**

Summary of Tasks Evaluated by Staff

- Evaluate potential changes in LLW regulatory program re: curtailment of Disposal Capacity
- Promulgate Rule for disposal of LAW
- SRP for Import/Export License Reviews
- Examine alternatives for DU Disposal
- Update LLW Extended Storage Guidance
- Develop Licensing Criteria for GTCC Disposal Facility
- Develop IP/SRP for 10 CFR 20.2002 Req.
- Identify and Evaluate Potential Legislative Changes
- Consolidate LLW Guidance
- Implement Major Revisions to 10 CFR Part 61
- Coordinate with other Agencies on Consistency in Regulating LAW Disposal
- Develop Guidance that Summarizes Disposition Options for low-end Materials and Waste
- Identify new Waste Streams
- Develop SRP for 10 CFR 61.58
- Develop WAC for LLW Disposal in UMT Impoundments
- Update Concentration Averaging BTP
- Develop Information Notice on Waste Minimization
- Examine Need for Guidance on Defining when RAM becomes LLW
- Perform Scoping Study on Financial Assurance
- Develop and Implement National Waste Tracking System

Criteria

- **NRC Strategic Goals—safety, security, effectiveness and openness**
- **Need (short, medium, long-term)**
- **Level of effort**
- **Commission direction**
- **Benefits**
- **Alternative futures**
- **Additional considerations**

Assessment of Programmatic Impact

- **Resource Implications for Each Task**
- **Resource Availability w/r Baseline Obligations**
- **Timelines for Commencement/Completion**
- **Leveraging External Resources**
- **Knowledge Management**

Next Steps

- **Complete Management Review**
- **Forward to Commission**
- **Commission Response**
- **Begin implementation of highest priority tasks**

WILD CARDS

- **Rulemaking to revise 10 CFR Part 61**
- **Expanded Capacity for Low Activity Waste**
- **Expanded Implementation of 10 CFR 61.58**
- **Legislative Changes**