

## **Comparison of LLW Disposal Performance Objectives 10 CFR 61 and DOE 435.1**

by

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WSRC-RP-2001-00341-TL

March 8, 2001

TO: P. H. Stevens, 703-H (3 copies)

A handwritten signature in cursive script, appearing to read 'B. T. Butcher', is written over the printed name.

FROM: B. T. Butcher, 773-43A (x5-5810)

**TRANSMITTAL OF COMPARISON OF LLW DISPOSAL PERFORMANCE  
OBJECTIVES 10 CFR 61 AND DOE 435.1**

Attached is the "Comparison of LLW Disposal Performance Objectives 10 CFR 61 and DOE 435.1", WSRC-RP-2001-00341, 3/1/2001. The purpose of this document is to support waste incidental to reprocessing decisions by the evaluation process, as required by DOE M 435.1, II.B(2)(a)2. Specifically, this document shows the essential comparability of the performance objectives for disposal of low-level waste contained in 10 CFR 61 (i.e., the Nuclear Regulatory Commission requirements for licensing a low-level waste disposal facility) and DOE 435.1 (i.e., the Department of Energy requirements for a DOE low-level waste disposal facility). This document will serve as a helpful reference for all waste incidental to reprocessing evaluations where the waste is to be disposed as low-level waste at the E-Area low-level waste disposal facility.

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**Comparison of LLW Disposal Performance Objectives  
10 CFR 61 and DOE 435.1**

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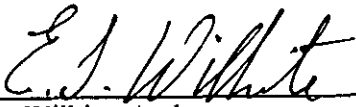
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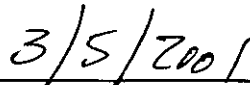
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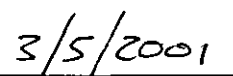
  
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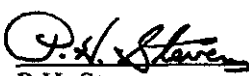
  
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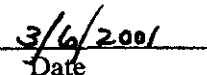
  
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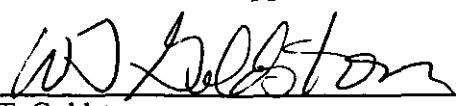
  
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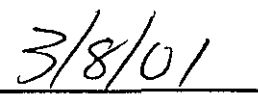
  
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## 1. Summary

This report documents that waste disposed according to DOE M 435.1 requirements for LLW disposal (i.e., performance objectives, performance assessment (PA), waste characterization, and other requirements) meets safety requirements comparable to the 10 CFR 61 performance objectives. This documentation supports waste incidental to reprocessing (WIR) decisions by the evaluation process for waste that is to be managed as low level waste (LLW) at the Savannah River Site (SRS) E-Area LLW disposal facility, specifically requirement DOE M 435.1, II.B (2)(a) 2.

## 2. Introduction

Requirements and guidance for managing Department of Energy (DOE) radioactive wastes are contained in DOE Order, Manual and Guide 435.1<sup>1</sup>. Radioactive waste is composed of three types or categories. These are high-level waste (HLW), transuranic waste (TRU), and low-level waste (LLW), defined as follows:

**HIGH-LEVEL WASTE.** High-level waste is the highly radioactive waste material resulting from the reprocessing of spent nuclear fuel, including liquid waste produced directly in reprocessing and any solid material derived from such liquid waste that contains fission products in sufficient concentrations; and other highly radioactive material that is determined, consistent with existing law, to require permanent isolation. [Adapted from: *Nuclear Waste Policy Act of 1982*, as amended]

**TRANSURANIC WASTE.** Transuranic waste is radioactive waste containing more than 100 nanocuries (3700 becquerels) of alpha-emitting transuranic isotopes per gram of waste, with half-lives greater than 20 years, except for: (1) high-level radioactive waste; (2) waste that the Secretary of Energy has determined, with the concurrence of the Administrator of the Environmental Protection Agency, does not need the degree of isolation required by the 40 CFR Part 191 disposal regulations; or (3) waste that the Nuclear Regulatory Commission has approved for disposal on a case-by-case basis in accordance with 10 CFR Part 61. [Source: *WIPP Land Withdrawal Act of 1992*, as amended]

**LOW-LEVEL WASTE.** Low-level radioactive waste is radioactive waste that is not high-level radioactive waste, spent nuclear fuel, transuranic waste, byproduct material (as defined in section 11e. (2) of the *Atomic Energy Act of 1954*, as amended), or naturally occurring radioactive material. [Adapted from: *Nuclear Waste Policy Act of 1982*, as amended]

High level waste is primarily composed of wastes arising from the reprocessing of spent nuclear fuel. Disposal of such wastes generally requires isolation by emplacement in a geologic repository. However, some wastes arising from reprocessing activities or management of HLW, which are determined to be safely manageable as LLW or TRU through the incidental to reprocessing determination process, need not be managed as HLW. These wastes can safely be disposed as low-level wastes or, if their content of transuranic radionuclides is sufficient, as transuranic waste.

DOE 435.1 lays out specific requirements for WIR determinations in the HLW chapter (DOE M 435.1, II.B). These requirements establish two means of identifying wastes as incidental to reprocessing. These are the citation process and the evaluation process. The citation process applies to certain materials such as contaminated job control wastes (e.g., clothing, tools) that obviously do not need geologic isolation. The evaluation process is a means of determining

whether other HLW wastes (i.e., those that are not cited or not obviously WIR) can safely be managed as either TRU or LLW.

The evaluation process for WIR to be managed as LLW requires that the wastes:

1. Have been processed, or will be processed, to remove key radionuclides to the maximum extent that is technically and economically practical; and
2. Will be managed to meet safety requirements comparable to the performance objectives set out in 10 CFR Part 61, Subpart C, *Performance Objectives*; and
3. Are to be managed, pursuant to DOE's authority under the *Atomic Energy Act of 1954*, as amended, and in accordance with the provisions of Chapter IV of this Manual, provided the waste will be incorporated in a solid physical form at a concentration that does not exceed the applicable concentration limits for Class C low-level waste as set out in 10 CFR 61.55, *Waste Classification*; or will meet alternative requirements for waste classification and characterization as DOE may authorize.

This report compares the Department of Energy requirements for disposal of low-level radioactive waste with the performance objectives of 10 CFR 61, "Licensing Requirements for Land Disposal of Radioactive Waste". The comparison shows that the Department of Energy low-level waste disposal requirements provide comparable protection to the public and the environment as the 10 CFR 61 performance objectives. Thus, any solid waste that meets the Savannah River Site waste acceptance criteria for low-level waste disposal at the E-Area Low-Level Waste Facility "will be managed to meet safety requirements comparable to the performance objectives set out in 10 CFR Part 61, Subpart C, *Performance Objectives*" and, thus, meets one of the waste incidental to reprocessing requirements of DOE 435.1 (i.e., DOE M 435.1, II.B (2)(a) 2).

### 3. 10 CFR 61

The Nuclear Regulatory Commission (NRC) requirement for disposal of LLW, 10 CFR 61, was issued on 12/27/1982. It was developed to provide specific regulations for the disposal of low-level radioactive waste (LLW) in near-surface disposal facilities<sup>2,3,4</sup>. A near-surface disposal facility is a land disposal facility in which radioactive waste is disposed within the upper 30 meters of the earth's surface. A geologic repository is not considered a land disposal facility.

There are seven subparts and 57 sections of 10 CFR 61, as listed below:

<u>Subpart</u>	<u>No. of Sections</u>
A. General Provisions	11
B. Licenses	19
C. Performance Objectives	5
D. Technical Requirements for Land Disposal Facilities	10
E. Financial Assurances	3
F. Participation by State Governments and Indian Tribes	4
G. Records, Reports, Tests, and Inspections	5

### 3.1 10 CFR 61 Performance Objectives

Subpart C of 10 CFR 61 lists the five performance objectives, which are reproduced below:

Section 61.40 General requirement.

Land disposal facilities must be sited, designed, operated, closed, and controlled after closure so that reasonable assurance exists that exposures to humans are within the limits established in the performance objectives in Secs. 61.41 through 61.44.

Section 61.41 Protection of the general population from releases of radioactivity.

Concentrations of radioactive material which may be released to the general environment in ground water, surface water, air, soil, plants, or animals must not result in an annual dose exceeding an equivalent of 25 millirems to the whole body, 75 millirems to the thyroid, and 25 millirems to any other organ of any member of the public. Reasonable effort should be made to maintain releases of radioactivity in effluents to the general environment as low as is reasonably achievable.

Section 61.42 Protection of individuals from inadvertent intrusion.

Design, operation, and closure of the land disposal facility must ensure protection of any individual inadvertently intruding into the disposal site and occupying the site or contacting the waste at any time after active institutional controls over the disposal site are removed.

Section 61.43 Protection of individuals during operations.

Operations at the land disposal facility must be conducted in compliance with the standards for radiation protection set out in part 20 of this chapter, except for releases of radioactivity in effluents from the land disposal facility, which shall be governed by Section 61.41 of this part. Every reasonable effort shall be made to maintain radiation exposures as low as is reasonably achievable.

Section 61.44 Stability of the disposal site after closure.

The disposal facility must be sited, designed, used, operated, and closed to achieve long-term stability of the disposal site and to eliminate to the extent practicable the need for ongoing active maintenance of the disposal site following closure so that only surveillance, monitoring, or minor custodial care are required.

Each of the performance objectives is briefly discussed in the following sections.

### 3.2 General requirement (10 CFR 61.40)

The general requirement essentially states the objective of shallow land disposal of LLW that all aspects of the disposal operation; selecting the site, designing the facility, operating the facility, closing the facility, and controlling it after closure, work together to provide "reasonable assurance" that the performance objectives will not be exceeded.



The term "reasonable assurance" is an important part of the disposal concept. It is an essential aspect of all licensing decisions by the NRC. Reasonable assurance is addressed in the licensing criteria for geologic repositories, 10 CFR 60<sup>5</sup>:

"While these performance objectives are generally stated in unqualified terms, it is not expected that complete assurance that they will be met can be presented. A reasonable assurance, on the basis of the record before the Commission, that the objectives and criteria will be met is the general standard that is required. For 60.112, and other portions of this subpart that impose objectives and criteria for repository performance over long times into the future, there will inevitably be greater uncertainties. Proof of the future performance of engineered barrier systems and the geologic setting over time periods of many hundreds or many thousands of years is not to be had in the ordinary sense of the word. For such long-term objectives and criteria, what is required is reasonable assurance, making allowance for the time period, hazards, and uncertainties involved, that the outcome will be in conformance with such objectives and criteria. Demonstration of compliance with such objectives and criteria will involve the use of data from accelerated tests and predictive models that are supported by such measures as field and laboratory tests, monitoring data, and natural analog studies."

The language in 10 CFR 61.40 is similar<sup>6</sup>.

### 3.3 Protection of the general population from releases of radioactivity (10 CFR 61.41)

This requirement establishes the measure for protecting the public from radioactive material that may be released from the disposal facility by any pathway (e.g., by migration through the groundwater). There are two parts to the requirement. First, the dose to the public from all pathways and all environmental media may not exceed 25 mrem to the whole body, 75 mrem to the thyroid, and 25 mrem to any other organ. The assignment of dose values for various organs is a consequence of the dose methodology that was accepted at the time the regulation was developed. At that time, ICRP-2<sup>7</sup> was the standard dose methodology recommended by the International Commission on Radiological Protection. Part 61 requires a PA to provide reasonable assurance that this performance objective will not be exceeded.

Secondly, this section requires that the as low as reasonably achievable (ALARA) process be applied to the disposal facility.

### 3.4 Protection of individuals from inadvertent intrusion (10 CFR 61.42)

This requirement reflects the intent of the NRC that persons inadvertently intruding into the waste be protected. The performance objective does not state quantitative limits on exposure. However, in the Environmental Impact Statement<sup>4</sup> for Part 61, a dose limit of 500 mrem/year was used to establish the waste classification scheme laid out in 10 CFR 61.55. The assessment of impacts to inadvertent intruders need not be a part of the PA required to provide reasonable assurance that the dose limit in 61.41 will not be exceeded. Rather, the site need only show that it is following the precepts of the waste classification scheme (i.e., stabilizing class B waste, providing an intruder barrier for class C waste)<sup>8,9</sup>.

### 3.5 Protection of individuals during operations (10 CFR 61.43)

This requirement references 10 CFR 20 *Standards for Protection Against Radiation*, which contains radiological protection standards for workers and the public. DOE requirements for occupational radiological protection are laid out in 10 CFR 835 *Occupational Radiation Protection* and those for radiological protection of the public and the environment are laid out in DOE 5400.5 *Radiation Protection of the Public and the Environment*. For the purposes of this document, the standards for occupational radiological protection and the general standards for radiological protection of the public and the environment in the DOE system will be assumed to be comparable with those in the NRC system. This requirement will not be discussed further.

### 3.6 Stability of the disposal site after closure (10 CFR 61.44)

The long-term stability of the closed disposal site is an important element of meeting the performance objectives. Site stability is focussed on reducing the contact of water with the waste and providing assurance that there will not be a need for active maintenance following closure<sup>8</sup>.

## 4. DOE 435.1 Performance Objectives and Requirements for LLW Disposal

The requirements for LLW disposal in DOE 435.1, and its predecessor Order, DOE 5820.2A<sup>10</sup>, were developed from the framework laid out in 10 CFR 61<sup>11</sup>. To show that DOE LLW disposal is as protective as the 10 CFR 61 performance objectives requires considering not only the DOE 435.1 performance objectives but also other DOE 435.1 requirements.

The DOE LLW disposal performance objectives (DOE M 435.1 IV.P (1)) are:

Low-level waste disposal facilities shall be sited, designed, operated, maintained, and closed so that a reasonable expectation exists that the following performance objectives will be met for waste disposed of after September 26, 1988:

- (a) Dose to representative members of the public shall not exceed 25 mrem (0.25 mSv) in a year total effective dose equivalent from all exposure pathways, excluding the dose from radon and its progeny in air.
- (b) Dose to representative members of the public via the air pathway shall not exceed 10 mrem (0.10 mSv) in a year total effective dose equivalent, excluding the dose from radon and its progeny.
- (c) Release of radon shall be less than an average flux of 20 pCi/m<sup>2</sup>/s (0.74 Bq/m<sup>2</sup>/s) at the surface of the disposal facility. Alternatively, a limit of 0.5 pCi/l (0.0185 Bq/l) of air may be applied at the boundary of the facility.

The other pertinent requirements are:

**Performance Assessment (DOE M 435.1 IV.P (2)).** A site-specific radiological performance assessment (PA) shall be prepared and maintained for DOE low-level waste disposed of after September 26, 1988. The performance assessment shall include calculations for a 1,000 year period after closure of potential doses to representative future members of the public and potential releases from the facility to provide a reasonable expectation that the performance objectives identified in this Chapter are not exceeded as a result of operation and closure of the facility.

**Releases ALARA** (DOE M 435.1 IV.P (2)(f)). Performance assessments shall include a demonstration that projected releases of radionuclides to the environment shall be maintained as low as reasonably achievable (ALARA).

**Water Resource Protection** (DOE M 435.1 IV.P (2)(g)). For purposes of establishing limits on radionuclides that may be disposed of near-surface, the performance assessment shall include an assessment of impacts to water resources.

**Inadvertent Intruder** (DOE M 435.1 IV.P (2)(h)). For purposes of establishing limits on the concentration of radionuclides that may be disposed of near-surface, the performance assessment shall include an assessment of impacts calculated for a hypothetical person assumed to inadvertently intrude for a temporary period into the low-level waste disposal facility. For intruder analyses, institutional controls shall be assumed to be effective in deterring intrusion for at least 100 years following closure. The intruder analyses shall use performance measures for chronic and acute exposure scenarios, respectively, of 100 mrem (1 mSv) in a year and 500 mrem (5 mSv) total effective dose equivalent excluding radon in air.

**Disposal Site Stability** (DOE M 435.1 IV.Q (1)). A preliminary closure plan shall be developed and submitted to Headquarters for review with the performance assessment and composite analysis. The closure plan shall be updated following issuance of the disposal authorization statement to incorporate conditions specified in the disposal authorization statement. Closure plans shall:

- (a) Be updated as required during the operational life of the facility.
- (b) Include a description of how the disposal facility will be closed to achieve long-term stability and minimize the need for active maintenance following closure and to ensure compliance with the requirements of DOE 5400.5, *Radiation Protection of the Public and the Environment*.

**Disposal Facility Closure** (DOE M 435.1 IV.Q (2)(c)). Institutional control measures shall be integrated into land use and stewardship plans and programs, and shall continue until the facility can be released pursuant to DOE 5400.5, *Radiation Protection of the Public and the Environment*.

## 5. DOE 435.1 Requirements Compared to 10 CFR 61 Performance Objectives

This section will compare each of the 10 CFR 61 performance objectives with the pertinent requirements of DOE M 435.1 to show the essential comparability of the protectiveness of DOE LLW disposal requirements with those of 10 CFR 61.

### 5.1 General Requirement

The preamble to the DOE 435.1 performance objectives (DOE M 435.1 IV.P (1)), "Low-level waste disposal facilities shall be sited, designed, operated, maintained, and closed so that a reasonable expectation exists that the following performance objectives will be met for waste disposed of after September 26, 1988", is nearly identical to that of the general requirement in 10 CFR 61 (i.e., 10 CFR 61.40). The DOE requirement adds the concept of maintenance, which is implicit in the NRC requirement. The DOE requirement does not mention control after closure,

but this concept is embodied in the DOE requirements for closure, specifically DOE M 435.1 IV.Q (2)(c), which requires DOE control until it can be shown that release of the disposal site for unrestricted use will not compromise DOE requirements for radiological protection of the public.

Thus, the DOE requirements for LLW disposal are comparable to the NRC general requirement.

## 5.2 Protection of the General Population

The first DOE performance objective (DOE M 435.1 IV.P (1)(a)) is essentially identical to 10 CFR 61.41. The only difference is the terms used to describe the dose. The NRC requirement uses terminology (i.e., 25 millirems to the whole body, 75 millirems to the thyroid, and 25 millirems to any other organ) that reflects the standard dose methodology in use at the time Part 61 was promulgated, which was ICRP 2<sup>7</sup>. The DOE requirement uses terminology (i.e., 25 mrem (0.25 mSv) in a year total effective dose equivalent, TEDE) reflective of the standard dose methodology now in use<sup>12</sup>. The measure of protection, 25 mrem, is the same. The NRC recommends using ICRP-30 dose methodology in computing potential dose from a LLW disposal facility to compare with this performance objective<sup>13,14</sup>. Both NRC and DOE require a PA to provide reasonable assurance of meeting this requirement.

The DOE requirements go beyond this NRC performance objective by requiring an assessment of the impacts of LLW disposal on water resources (i.e., DOE M 435.1 IV.P (2)(g)). At SRS, this requirement is interpreted to mean that groundwater at the point of compliance is not to exceed the requirements for public drinking water sources. One of these requirements is that no member of the public may receive an annual dose of more than 4 mrem from man-made beta- or gamma-emitting radionuclides<sup>14</sup>. Thus, for these radionuclides, which includes fission- and activation-products that comprise much of DOE LLW, the DOE requirement, as implemented at SRS, is more stringent than the NRC requirement.

The NRC requirement also includes maintaining releases to the environment ALARA. Although this is not included in the DOE performance objective, it is included in the PA requirements (i.e., DOE M 435.1 IV.P (2)(f)).

Thus, the DOE requirements for LLW disposal are comparable, if not more stringent, to the NRC requirement for protection of the general population from releases of radioactivity.

## 5.3 Protection of Individuals from Inadvertent Intrusion

The DOE LLW disposal requirement that the PA shall include an assessment of the impacts on a person inadvertently intruding into the disposal facility (DOE M 435.1 IV.P (2)(h)) is more stringent than the NRC requirement. The NRC waste classification system is based on intruder calculations using a 500 mrem per year dose limit<sup>4</sup>. The DOE requirement uses a 100 mrem per year limit for chronic exposures and a 500-mrem limit for acute exposures.

Thus, the DOE requirements for LLW disposal are more stringent than the NRC requirement for protection of the inadvertent intruder.

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<sup>4</sup> NUREG-1573 states (Section 3.3.7.1.2, page 3-79): "As a matter of policy, the Commission considers 0.25 mSv/year (25 mrem/year) TEDE as the appropriate dose limit to compare with the range of potential doses represented by the older limits that had whole-body dose limits of 0.25 mSv/year (25 mrem/year)."

#### 5.4 Stability of the Disposal Site After Closure

The DOE LLW disposal requirements address consideration of the long-term stability of the site by requiring description of how closure will achieve stability in the closure plan and a description of how closure will minimize the need for active maintenance following closure (DOE M 435.1 IV.Q (1)(b)). Additionally, one of the PA requirements (DOE M 435.1 IV.P (2)(c)) states: "Performance assessments shall address reasonably foreseeable natural processes that might disrupt barriers against release and transport of radioactive materials." Thus, the PA must include a projection of the long-term stability of the site, such as erosion, degradation of waste packages, etc. Implicit in the development of the PA and closure plan is the control of water because water is the primary means by which radionuclides are transported from the waste.

Thus, the DOE requirements for LLW disposal are comparable to the NRC requirement for stability of the disposal site after closure.

### 6. Implementation of DOE 435.1 LLW Disposal Requirements at the SRS E-Area LLW Facility

At the Savannah River Site, the DOE requirements for LLW disposal have been implemented. The implementation of the requirements can be viewed as a sequence of activities that, taken together, provide reasonable assurance that the exposure of the public and the environment to radioactive materials released from the LLW disposal facility will not exceed DOE standards, which have been shown to be comparable to or more stringent than those of the NRC. These activities are discussed below.

#### 6.1 Performance Assessment

The Savannah River Site has completed a PA of its LLW disposal facility, the E-Area Low-Level Waste Facility<sup>15</sup>. The PA has been reviewed and approved by DOE Headquarters<sup>16</sup>. The PA considers all the elements of the design of each of the disposal units (e.g., concrete vaults, earthen trenches), the current and projected radionuclide inventory, the physical and chemical processes that control the release of radionuclides from the disposal unit and their transport through the environment, and reasonably expected future human activities, to project potential impacts to human health and the environment. Additionally, a closure plan for the E-Area Low-Level Waste Facility (LLWF)<sup>17</sup> has been developed to ensure the long-term stability of the facility. As required by DOE 435.1, a maintenance program has been developed to reduce uncertainty in the PA<sup>18</sup>.

#### 6.2 Waste Acceptance Criteria

The PA results are used to calculate radionuclide inventory limits for each disposal unit and each performance measure (e.g., 25 mrem/year to any member of the general public, 100 mrem/year from chronic exposure to an inadvertent intruder). For each disposal unit and radionuclide, the inventory limits are examined to determine which performance measure is most restrictive. The most restrictive limits, as well as design details, and other requirements (e.g., criticality safety) are used to establish waste acceptance criteria (WAC). The WAC<sup>19</sup> limit the types and quantities of LLW that may be emplaced in each disposal unit.

### 6.3 Waste Characterization and Certification

To ensure accurate and reliable determination of the radionuclide content of each waste package to be received at the E-Area LLWF, procedures for waste characterization<sup>20</sup> and for certifying a generator's waste characterization program<sup>21</sup> have been developed and implemented.

## 7. Conclusion

The Department of Energy requirements for disposal of low-level radioactive waste have been shown to be at least as protective as the performance objectives of 10 CFR 61, "Licensing Requirements for Land Disposal of Radioactive Waste". Thus, any solid waste that meets the Savannah River Site waste acceptance criteria for low-level waste disposal at the E-Area Low-Level Waste Facility "will be managed to meet safety requirements comparable to the performance objectives set out in 10 CFR Part 61, Subpart C, *Performance Objectives*" and, thus, meets one of the waste incidental to reprocessing requirements of DOE 435.1 (i.e., DOE M 435.1, II.B (2)(a) 2).

## 8. References

1. U.S. DOE. *Radioactive Waste Management*, Order 435.1, U. S. Department of Energy (7/9/99).
2. Federal Register, Vol. 47, No. 248, p 57446 (12/27/82).
3. U.S. Code of Federal Regulations, 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste".
4. U.S. NRC, *Final Environmental Impact Statement on 10 CFR Part 61 "Licensing Requirements for Land Disposal of Radioactive Waste"*, NUREG-0945, 11/82.
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## Document Approval Sheet

 Document No.  
 WSRC-RP-2001-00341

 Requested Approval Date  
 4-23-2001

Title Comparison of LLW Disposal Performance Objectives 10 CFR 61 and DOE 435.1			Position Sr. Advisory Scientist		User ID T3881			
Primary Author/Contact (Must be WSRC) Elmer Wilhite		Location 773-43A		Phone No. 5-5800				
Organization Code L3200		Organization (No Abbreviations) Waste Processing Technology						
Other Authors			Key Words (list 3) Incidental Waste, Evaluation, HLW, LLW Disposal,					
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WSRC-RP-2001-00341  
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Ms. W. F. Perrin, Technical Information Officer  
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Dear Ms. Perrin:

REQUEST FOR APPROVAL TO RELEASE SCIENTIFIC/TECHNICAL INFORMATION

The attached document is submitted for classification and technical approvals for the purpose of external release. Please complete Part II of this letter and return the letter to the undersigned by 4/23/2001. The document has been reviewed for classification and export control by a WSRC Classification staff member and has been determined to be Unclassified.

*Kevin Schmidt*  
Kevin Schmidt, WSRC STI Program Manager

I. DETAILS OF REQUEST FOR RELEASE

Document Number: WSRC-RP-2001-00341

Author's Name: E. L. Wilhite

Location: 773-43A

Phone 5-5800

Department: Waste Processing Technology

Document Title: Comparison of LLW Disposal Performance Objectives 10 CFR 61 and DOE 435.1

Presentation/Publication:

Meeting/Journal:

Location:

Meeting Date:

N/A

OSTI Reportable

II. DOE-SR ACTION

Date Received by TIO 03/13/2001

- ☒ Approved for Release  
☐ Approved Upon Completion of Changes  
☐ Approved with Remarks  
☐ Not Approved  
☐ Revise and Resubmit to DOE-SR

Remarks:

*W. F. Perrin*

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3/28/01  
Date

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RECORD STATUS (select one):

☒ New ☐ Revised Data ☐ Revised STI Product

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a. Date Filed (mm/dd/yyyy) \_\_\_/\_\_\_/\_\_\_

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c. Patent Assignee .....

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B. STI PRODUCT TITLE Comparison of LLW Disposal Performance Objectives 10 CFR 61 and DOE 435.1

C. AUTHOR(s) E. L. Wilhite

E-mail Address(es): .....

D. STI PRODUCT IDENTIFIER

1. Report Number(s) WSRC-RP-2001-00341

2. DOE Contract Number(s) DE-AC09-96SR18500

3. R&D Project ID(s) .....

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E. ORIGINATING RESEARCH ORGANIZATION Savannah River Site

F. DATE OF PUBLICATION (mm/dd/yyyy) 3/28/2001

G. LANGUAGE (if non-English) English

(Grantees and Awardees: Skip to Description/Abstract section at the end of Part I)

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Keywords Incidental Waste Evaluation HLW LLW Disposal

K. DESCRIPTION/ABSTRACT

This report documents that waste disposed according to DOE M 435.1 requirements for LLW disposal (i.e., performance, objectives, performance assessment (PA), waste characterization, and other requirements) meets safety requirements comparable to the 10 CFR 61 performance objectives.

US DEPARTMENT OF ENERGY  
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Name and/or Position Kevin Schmidt, Manager STI Program & Site Support  
E-mail \_\_\_\_\_ Phone (803) 725-2646  
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