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# PUBLIC SUBMISSION

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**Docket:** NRC-2011-0183

Request for Comments on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management

**Comment On:** NRC-2011-0183-0001

Request for Comments on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management

**Document:** NRC-2011-0183-DRAFT-0001

Comment on FR Doc # 2011-20666

## Submitter Information

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**Submitter's Representative:** President, HPS

**Organization:** Health Physics Society

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SEP 7 2011

RULES

## General Comment

See attached file(s)

## Attachments

Comments on NRC LLW policy - 09-06-11

SUNSI Review Complete  
Template = ADM-013

E-RIDS = ADM-03  
Old = D. LOWMAN (DBL1)



# HEALTH PHYSICS SOCIETY

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*Specialists in Radiation Safety*

September 6, 2011

Cindy K. Bladey  
Chief, Rules, Announcements and Directives Branch (RADB)  
Division of Administrative Services, Office of Administration  
Mail Stop: TWB-05-B01M  
U.S. Nuclear Regulatory Commission  
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Attn: Rulemaking and Adjudications Staff

**Subject: Docket ID NRC-2011-0183, Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management**

Dear Ms. Bladey:

The Health Physics Society<sup>1</sup> (HPS) is a professional organization whose mission is to promote excellence in the science and practice of radiation safety. The HPS appreciates the opportunity to respond to the solicitation of public comments on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management.

The HPS has taken the position that the goal of managing low level radioactive waste (LLRW) is to ensure the safety of workers and the public and to protect the environment. To achieve this goal, disposal, not long-term storage, is the best and safest long-term approach.

The NRC Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management encourages licensees to continue to enhance their efforts to reduce their volume of LLRW through a variety of management techniques. The goal of these actions is to extend the life of current LLRW disposal sites. In addition, the NRC has provided a list of resources available to licensees to assist them in their efforts to reduce the volume of LLRW [Regulatory Issue Summary (RIS 11-09)] and to achieve the objectives of the draft policy statement.

The HPS supports the NRC Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management. In general, the HPS does not support the long term storage of LLRW, but does recognize that certain licensees (such as medical licensees) have very few options for disposal of certain sources such as <sup>137</sup>Cs sources no longer needed for brachytherapy. The HPS is very supportive of LLRW management techniques that reduce volume and extend the life of LLRW

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waste disposal sites, because ultimately disposal results in a lower risk to workers and the public than long term storage. The HPS encourages the NRC to pursue avenues for disposal of long lived radioactive sources that are currently stored by licensees because they have no reasonable method for disposal.

Thank you again for the opportunity to share our thoughts on the Draft Policy Statement on Volume Reduction and Low-Level Radioactive Waste Management.

If you have any questions regarding these comments, please feel free to contact me at 509-371-7888 or [kathy.pryor@pnnl.gov](mailto:kathy.pryor@pnnl.gov).

Sincerely,



Kathryn H. Pryor, CHP  
President

cc: Brett Burk

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<sup>1</sup> The Health Physics Society is a nonprofit scientific professional organization whose mission is to promote the practice of radiation safety. Since its formation in 1956, the Society has grown to approximately 5,000 scientists, physicians, engineers, lawyers, and other professionals representing academia, industry, government, national laboratories, the department of defense, and other organizations. Society activities include encouraging research in radiation science, developing standards, and disseminating radiation safety information. Society members are involved in understanding, evaluating, and controlling the potential risks from radiation relative to the benefits. Official position statements are prepared and adopted in accordance with standard policies and procedures of the Society.