



Council on Radionuclides and Radiopharmaceuticals, Inc.

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Mail Stop: TWB-05-B01M,
U. S. Nuclear Regulatory Commission,
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Subject: CORAR Comments to NRC on Potential Revision of the Branch Technical Position on Concentration Averaging and Encapsulation. Docket ID NRC-2011-0022

Reference: Federal Register Vol.76, No 17, January 26, 2011, Pages 4739-4741. Notice of Public Meeting and Request for Comments.

These comments are submitted on behalf of the Council on Radionuclides and Radiopharmaceuticals (CORAR)¹. CORAR manufacturer members and their customers throughout the U.S. generate Class A, B, C and GTCC LLRW in a variety of homogeneous and heterogeneous forms. Most CORAR member's customers are licensees in the biomedical community that also generate similar volume of LLRW of all Classes but mostly of much lower concentration and predominantly many different forms of Class A radwaste.

The majority of material licensees are small radwaste generators and use licensed brokers and processors who collect, consolidate and/or process radwaste to create a viable package for LLRW disposal. Manufacturers and biotech licensees have hundreds of separate radwaste forms that must be consolidated to ensure they are expedited for offsite processing and disposal to meet license timing conditions. Some of these radwaste forms are blended on the generator's site or by offsite processors to expedite cost-effective disposal. This practice is necessary to optimize safety and security. Material licensees do not individually generate large quantities of Class B and C LLRW and any blending is likely to be of small scale for the foreseeable future.

1. CORAR members include the major manufacturers and distributors of radioactive chemicals, radioactive sources, radiopharmaceuticals and research radionuclides used in the U.S. for therapeutic and diagnostic medical applications and for industrial, environmental and biomedical research and quality control.

Enclosed are two attachments. The first was previously submitted to the NRC on February 26, 2010 explains material licensee LLRW practices. SECY-10-043 addressed most of these CORAR comments on blending. A concern that was not mentioned is the need to evaluate the financial impact of potential changes on the economic viability of the current LLRW disposal sites and the continued ability for licensees to afford the cost of LLRW disposal.

In the second attachment CORAR provides a few comments on the NRC's Interim Guidance to Agreement States, "Summary of Existing Guidance for Reviewing Large-Scale LLRW Blending Proposals" dated March 17, 2011, and provides answers to some of NRC's questions on the "Potential Revision on the BTP on CA". Most material licensee experience is with the safe and secure generation, processing and packaging of radwaste for prompt disposal or extended storage. We have had only limited and intermittent involvement in developing high integrity disposal containers and with disposal site characterization and performance. Consequently, in these comments we have focused on how these changes may affect optimized licensee programs rather than how disposal conditions and regulations may be updated.

CORAR members have scheduled a meeting on May 10, 2011 where we intend to determine how we can further participate in these developments on LLRW blending. We would welcome feedback from the NRC on any particular issues that we might be able to respond to at the next NRC public meeting on this topic in October, 2011 or earlier as needed.

CORAR appreciates the opportunity to submit comments and would be glad to provide clarification or additional information.

Yours Sincerely,

Leonard R. Smith, CHP
Co-chair CORAR Committee on Manufacturing Quality and Safety.

Enclosures: CORAR RESPONSE TO NRC QUESTIONS ON BLENDING LLRW

CORAR COMMENTS TO THE NRC ON LLRW BLENDING.