

LOW-LEVEL RADIOACTIVE WASTE FORUM, INC.

2657 Bayview Drive – Ft. Lauderdale, FL 33306
(754) 779-7551 * (754) 223-7452 FAX

3/5/2014
79FR 12531

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April 4, 2014

Cindy Bladey
Chief
Rules, Announcements and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop 3WFN-06-44M
Washington, DC 20555-0001

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2014 APR 14 PM 3:28

RULES AND DIRECTIVES
BRANCH
USNRC

Re: Docket ID NRC-2013-0230

Dear Ms. Bladey:

The attached comments are submitted on the U.S. Nuclear Regulatory Commission's (NRC's) draft Strategic Plan covering Fiscal Year 2014-2018 by the Low-Level Radioactive Waste Forum, Inc. (LLW Forum)—an organization established to facilitate state and compact implementation of the Low-Level Radioactive Waste Policy Act of 1980 and its 1985 Amendments (LLRWPA) and to promote the objectives of low-level radioactive waste regional compacts.

Please call (754) 779-7551 or (202) 423-6920 if you have any questions.

Thank you.

Regards,

Todd D. Lovinger, Esq.
Executive Director

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Comments from the Low-Level Radioactive Waste Forum U.S. Nuclear Regulatory Commission's Draft Strategic Plan Fiscal Year 2014-2018

The following comments are submitted on the U.S. Nuclear Regulatory Commission's (NRC's) draft Strategic Plan, covering Fiscal Year 2014-2018 by the Low-Level Radioactive Waste Forum, Inc. (LLW Forum)—an organization established to facilitate state and compact implementation of the Low-Level Radioactive Waste Policy Act of 1980 and its 1985 Amendments (LLRWPA) and to promote the objectives of low-level radioactive waste regional compacts:

- As NRC is considering proposed revisions that would amend Part 61 of Title 10 of the *Code of Federal Regulations* (10 CFR), "Licensing Requirements for Land Disposal of Radioactive Waste;" the Strategic Plan should direct staff to directly communicate with and seek feedback specifically from, and give enhanced consideration to responses from, representatives of the sited states on the proposed revisions to 10 CFR Part 61 as stated in a resolution unanimously passed by the LLW Forum's Board of Directors (and previously transmitted to NRC) on October 23, 2013. The LLW Forum resolution may be found in the *LLW Notes*, September/October 2013, pp. 5-6 as located at <http://www.llwforum.org/pdfs/LLWFORUMNOTES2013SepOct.pdf>.
- The Strategic Plan should include a comprehensive and thorough assessment of the LLW Forum's Disused Sources Working Group (DSWG) report—with particular emphasis and focus on recommended regulatory and other actions that the NRC should take to reduce the national security risk from sealed sources. The DSWG report may be found at <http://www.llwforum.org/pdfs/LLW%20Forum%20DSWG%20Report%20Final%203.19.14.pdf>.
- In the development of an information notice for waste minimization, NRC should emphasize the importance of "source reduction" as well as volume reduction.
- The last bullet in the Future Challenges section (page 8) should include concrete actions in addition to monitoring to ensure the safety of radioactive materials.
- The Safety or Security sections (pages 11 and 12) should more explicitly address the risk from sealed sources.
- Regarding Objective 2.1 (page 26), additional concrete actions should be taken to reduce the risk from sealed sources without a sector-specific credible threat.

The LLW Forum is dedicated to the goals of educating policy makers and the public about the management and disposal of low-level radioactive wastes and fostering information sharing and the exchange of views between state and compact policy makers, federal officials, industry representatives and other interested stakeholders. Directors that serve on the Board of the LLW Forum are appointed by Governors and compact commissions.

For questions or additional information, please contact the LLW Forum's Executive Director, Todd D. Lovinger Esq., at (754) 779-7551 or at LLWForumInc@aol.com.