

August 24, 2015

Mr. Joseph J. Weismann, CHP  
Vice President of Radiological Programs  
and Field Services  
US Ecology, Inc.  
Lakepointe Centre I  
300 East Mallard Dr., Suite 300  
Boise, ID 83706

SUBJECT: US ECOLOGY, INC. – TECHNICAL EVALUATION REPORT OF US ECOLOGY  
IDAHO'S PROPOSED METHODOLOGY SUPPORTING ALTERNATE WASTE  
DISPOSAL PROCEDURES IN ACCORDANCE WITH 10 CFR 20.2002

By letter dated June 14, 2013, US Ecology, Inc. (USEI) requested an exemption to receive and dispose of low-activity radioactive waste from Studsvik's Processing Facility in Memphis, TN at USEI, a Resource Conservation and Recovery Act Subtitle-C hazardous and low-activity waste facility near Grand View, ID. USEI also requested that the U.S. Nuclear Regulatory Commission (NRC) review a newly developed Site-Specific Dose Assessment Methodology (SSDA). In a letter dated March 10, 2014, USEI withdrew the request to dispose of low-activity waste from Studsvik Processing Facility; however, USEI requested that the NRC continue to review the SSDA. USEI stated that this process provides a streamlined methodology for preparing and reviewing future 10 CFR 20.2002 alternate disposal requests (ADR) from USEI.

This Technical Evaluation Report (TER) documents the NRC staff's technical review of the proposed methodology. Similar to a review of a 10 CFR 20.2002 exemption request, the NRC staff performed a technical review of the methodology and associated documents and evaluated the technical basis and assumptions incorporated into the calculations used by USEI. The NRC staff also used the methodology to evaluate a previously evaluated exemption request and compared the conclusions. Based on this review, the NRC staff considers the use of USEI's SSDA to be an appropriate method for evaluating future proposed disposals. The SSDA methodology can be used to satisfy the criteria in § 20.2002 (d); however, individual 20.2002 requests by USEI, or other licensees wishing to ship to USEI, must address the criteria in § 20.2002 (a), (b), or (c) separately.

In response to your initial request, the SSDA, the technical basis document, and the NRC's detailed TER are considered proprietary and will not be available for public review. However, a second, publicly-available TER was also developed to demonstrate how this process will satisfy the NRC's mission of protecting public health, safety, and the environment. The NRC would note that specific parameter values, in the necessary form, that have not always been included with historical submittals may need to be included in future submittals in order for the SSDA methodology to be used.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure, "a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Copies of both TERs are enclosed. Please contact Mr. Maurice Heath if you have any questions concerning the above. He can be reached at (301) 415-3137 or via email at [Maurice.Heath@nrc.gov](mailto:Maurice.Heath@nrc.gov).

Sincerely,

*/RA/*

Larry W. Camper, Director  
Division of Decommissioning, Uranium Recovery,  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Enclosures:

Technical Evaluation Report (Proprietary Version)  
Technical Evaluation Report (Public Version)

J. Weismann

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Larry W. Camper, Director  
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