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Guidance Document for Alternative Disposal Requests

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Revision of the Guidance Document for alternative Disposal Requests

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General Comment

The guidance states: The PM will coordinate among all external and internal parties involved in the disposal request and its reviews, including any affected States. Is NRC putting itself in a bad spot by acting as the coordinating agency for licensees? My experience is that states with RCRA facilities accepting radioactive wastes have limited resources and would prefer the disposal facility to coordinate with them rather than other groups. In this matter the disposal facility can prioritize its disposal actions as needed and to be involved in the discussions between a customer, government agency, and the State. The NRC PM being responsible for these contacts also is complicated when a state and facility may accept a waste stream but the public or local stakeholders do not support the facility accepting the material. Is NRC prepared to support licensees and the facilities in public meetings should they be required? It would seem that the licensee working with the facility should be required to demonstrate in the alternate disposal request that all appropriate contacts are made and the NRC PM should simply review the request for completeness.

SUNSI Review Complete

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