

# PUBLIC SUBMISSION

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**Docket:** NRC-2018-0155

Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest

**Comment On:** NRC-2018-0155-0003

Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest

**Document:** NRC-2018-0155-DRAFT-0006

Comment on FR Doc # 2018-27630

## Submitter Information

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SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD= Lloyd Desotell,

COMMENT (4)  
 PUBLICATION DATE:  
 12/21/2018  
 CITATION # 83 FR 65759

## General Comment

Comments are provided in the attached pdf document.

## Attachments

State of Washington comments on LLRW Uniform Manifest update\_Jan 2019



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

OFFICE OF RADIATION PROTECTION

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January 31, 2019

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

On behalf of the State of Washington, below for your consideration are comments on NUREG/BR-0204 Rev.3, "Instructions for Completing Nuclear Regulatory Commission's (NRC) Uniform Low-Level Radioactive Waste (LLRW) Manifest", as published in the Federal Register (83 FR 54620), dated October 30, 2018.

1. NRC Form 540, Item 17 is total weight or volume. The NUREG/BR does not have a standard for accuracy. NRC Form 541, Item 7 (volume) has an accuracy standard of the nearest hundredth of a cubic meter. Recommend an accuracy standard be added for this item.
2. The NRC Form 541, Item 8 is waste and container weight. The NUREG/BR does not have a standard for accuracy. As noted earlier, NRC Form 541, Item 7 (volume) has an accuracy standard. Recommend an accuracy standard be stated for this item.
3. NRC Form 541, Item 9 is waste weight. The NUREG/BR does not have a standard for accuracy. As noted earlier, NRC Form 541, Item 7 (volume) has an accuracy standard. Recommend an accuracy standard be stated for this item.

If you should have any questions regarding these comments, please contact Kevin Siebert by email [kevin.siebert@doh.wa.gov](mailto:kevin.siebert@doh.wa.gov) or by phone at (360) 236-3247.

Sincerely,

Earl Fordham, CHP, PE  
Deputy Director  
Office of Radiation Protection

