

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PENNSYLVANIA POWER & LIGHT COMPANY)	
)	
and)	Docket Nos. 50-387
)	50-388
ALLEGHENY ELECTRIC COOPERATIVE, INC.)	
)	
(Susquehanna Steam Electric Station,)	
Units 1 and 2))	

APPLICANTS' TESTIMONY OF
HAROLD W. KEISER
ON CONTENTION 11 (ON-SITE STORAGE OF LOW-LEVEL RADIOACTIVE WASTES)

September 16, 1981

TESTIMONY OF HAROLD W. KEISER
ON
CONTENTION 11 (ON-SITE STORAGE OF LOW-LEVEL RADIOACTIVE WASTES)

Applicants currently intend to ship all low-level radioactive waste ("LLRW") generated at the Susquehanna Steam Electric Station ("SSES") off site after minimal storage in the SSES Radwaste Building. The SSES Radwaste Building includes capacity for temporary LLRW storage equivalent to about thirty (30) days nominal generation rates. The storage is described in §§ 11.4.2.2, 11.4.2.3, and 12.2.1.5.2 of the Final Safety Analysis Report.

Applicants have a contractual agreement with Hittman Nuclear & Development Corporation for transportation and disposal services for LLRW generated at SSES. Three commercial LLRW disposal sites are currently in operation -- Barnwell, S.C., Beatty, Nev., and Richland, Wash. Applicants' contractual agreement does not, however, guarantee that disposal capacity will be available. Because the Barnwell facility is limiting the volume of LLRW it accepts to 100,000 cu. ft. per month and has imposed a system to allocate that capacity, Applicants are not guaranteed available space at Barnwell. The Beatty and Richland facilities have not imposed similar limitations and these facilities, as of the present time, would accept LLRW shipped from SSES.*

* An initiative which would have barred the use of the Richland site for disposal of LLRW from SSES was declared unconstitutional by the U.S. District Court for the Eastern District of Washington on June 26, 1981.

Congress, in December 1980, assigned to the states the responsibility for providing LLRW storage capacity. (Low-level Radioactive Waste Policy Act, Pub. L. No. 96-573). That law encourages states to enter into interstate compacts for regional disposal sites and allows those compacts (if approved by Congress) after January 1, 1986 to exclude LLRW generated in states which are not party to that compact. The Pennsylvania Energy Policy includes a strategy that

Pennsylvania should, in conjunction with other Northeastern states, develop a plan for the storage of low-level radioactive wastes generated within their borders. An intensive effort should be made to develop a plan for the Northeast/Mid-Atlantic states.

Governor's Energy Council, Pennsylvania Energy Policy (July 1981), p. 100.

Although off-site disposal capacity for LLRW generated at SSES is currently available, the uncertainties of future availability led to Applicants' decision to construct on-site interim LLRW storage capacity in the event that off-site disposal becomes temporarily unavailable. The low-level Radioactive Waste Holding Facility ("LLRWHF") at SSES would provide this contingency storage capacity. Applicants intend to store LLRW in the LLRWHF only if off-site disposal becomes unavailable. The safety of storage in the LLRWHF is described in the testimony of R.J. Tosetti.