STATEMENT OF MATERIAL FACTS IN DISPUTE

RE EDDLEMAN CONTENTION 67

1. The Southeastern LLRW Compact has not been ratified.

2. The Staff and Applicants' affiants have contradicted the FSAR and made or approved errors in calculated LLRW volumes to be produced by Harris.

3. The volume of LLRW produced by Harris will fill twice as many 55-gallon drums as Applicants and Staff claim, or thereabouts, even with the volume reduction system working.

4. Without the volume reduction system, the annual output of Harris LLRW would double again to about 7000 drums, over 4 times the Applicants/Staff figure.

5. This number of drums would fill all the storage space asserted to be available (areas not identified, nor space on floor given, in affidavits) in about a year.

6. At most the storage would last 2 years or so, under the correction for Applicants/Staff errors in item 3 above.

7. Applicants nor Staff have guaranteed that Congress will approve the Southeastern LLRW Compact by a year or 2 after the Harris plant opens.

8. The Staff's "Turkey Point test" implied 6 years' storage and eventual assured disposal (Staff "Response at 7).

NOTE: In my opinion the Staff is as slavish as ever in agreeing with Applicants even when they seem obviously wrong (compare 8F1 argument on size of coal particulates being increased by radioactive atoms attaching to them, so much that they could not be breathed into the deep lung).

TABLE 11.4.2-1

OUTPUT FROM SOLID WASTE PROCESSING SYSTEM*
(TWO UNITS)

Source	Form	Quantity (cu ft/yr)	FT³/drum	Quantity*** (drums/year)
Spent Resins	Solidified	4,250 (1)	5	850(3)
Evaporator Bottoms	Solidified	21,350 (1)	5	4,270
Filter Particulates	Solidified	5,400** (1)	5	1,080**
Dry Solids	Compressed	6,000 (2)	6	1,000
Chemical Drains	Solidified	375 (1)	5	75
TOTAL:				7,275

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Notes: (Bases for Values)

1) Based on two volumes of waste per volume of solidification agent.

2) Based on a four to one reduction ratio.

3) Based on 55 gal. drums. High Integrity Containers (HIC) may be used as an alternate method of packing. 5

* Table gives maximum annual volumes; for expected volumes delete spent resin from the condensate demineralizers and the detergent evaporator bottoms. Thus, the expected volumes are those associated with primary systems and the maximum volumes include volumes associated with the secondary systems.

** With the volume reduction subsystem the outputs of evaporator bottoms will be 2540 cu. ft./yr., 508 drums/yr.; the outputs of filter particulates will be 643 cu. ft./yr., 129 drums/yr.

*** These estimates are conservative since the volume per drum is assumed to be substantially less than the actual volume of the 55 gal. drums.

~7.5 (231 in³) gallons/ft³ 1 ft³ = 1728 cu in

$\frac{55 \text{ gal.}}{7.5} = 7.33 \text{ ft}^3/\text{drum}$