



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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MEMORANDUM FOR: Those on Attached List

FROM:

Sher Bahadur, Acting Chief
Low-Level Waste Management Branch
Division of Low-Level Waste Management
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Office of Nuclear Material Safety
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LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
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Office of Nuclear Reactor Regulation

SUBJECT:

WASTE VOLUME REPORTING REQUIREMENTS OF RG 1.21 AND
THE NEED FOR WASTE CLASSIFICATION DOCUMENTATION

The minutes of the April 1992 Reactor Health Physics Counterpart meeting identified two items (K-5 and K-6) requiring resolution. The first involved a question regarding the volumes and activity of low-level waste, sent offsite for processing, which should be reported per RG 1.21 in the reactor licensees' semiannual (now annual) effluent release reports (i.e., per 50.36a). This question came up again recently in a telephone conversation with a contractor involved in decommissioning activities at the Shoreham plant. The second item involved the need for a licensee to provide waste classification documentation for radioactive material shipped to a processor for segregation prior to subsequent offsite disposal.

The solid waste information reported in the annual report should be the volume and activity of the low-level waste leaving the reactor site which the licensee believes will be sent directly, or via a processor or collector, to a licensed disposal site. Consistent with this response, and Regulatory Guide 1.21, Table 3, the report should identify the type of waste, the number of shipments, mode of transportation, and destination of the waste shipments leaving the licensee's facility. If it is known by the licensee that waste shipped to a processor is to be received back following processing, the volume and activity of the processed waste would not be included in the annual reports until the waste again leaves the site for disposal.

With respect to the second item, current regulations [20.311(d)] require the preparation of a manifest for transfers of radioactive waste to a land disposal facility, a licensed waste collector, or a licensed waste processor. The term, "radioactive waste," as used above applies to the transfer of any radioactive material for which no further use by the licensee is foreseen (e.g., material sent for compaction prior to disposal is waste; contaminated tools transferred for decontamination prior to intended reuse is not waste).

On the follow-on question, the regulations do not require a generator to classify waste being sent to a processor. Classification is only required if the generator is shipping low-level waste to a collector or directly to the disposal site. Note that the May 1983 Technical Position on Radioactive Waste Classification incorrectly states that transfers of waste to a processor require licensees to classify the waste. A pending revision to this Technical Position incorporates the needed correction.

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