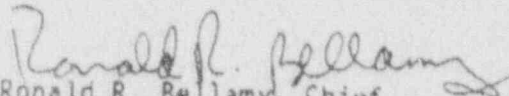


interim storage. The first condition is to be used when the licensee does not desire to store waste for an extended period of time or does not submit an acceptable radioactive waste storage plan. As appropriate, you should construct a deficiency paragraph(s) to request additional information on the waste storage plan from the licensee. Attachment 2 also includes a paragraph explaining that the time limit condition has been added to the license. The second condition incorporates, as a license requirement, the licensee's radioactive waste storage plan.

In the review of waste storage plans, follow the guidance in Policy and Guidance Directive FC 90-03. The objective of your review is to ensure that waste will be properly identified, packaged, be physically secure and reasonably protected from fire and the elements and will not contribute unnecessary radiation exposure to the facility staff and the general public. In other words, to approve a plan you must conclude that, if the licensee follows the proposed waste storage plan, the stored waste will not create a potential radiation hazard to surrounding areas, potential release of radioactive materials to unrestricted areas or increased hazards to the facility personnel. The licensee must describe an explicit and well documented program for storage facility operations. The program must include provisions for material security and inventory, fire protection, effluent controls, effluent monitoring, shielding and area radiological controls. Written procedures for radiological surveys and periodic audits must also be included. An effective program for periodically inspecting and repairing or replacing damaged or deteriorating containers must be explicitly described. The elements of the plan should take into account the isotopes, waste forms and quantities to be stored.

This guidance applies to all new and renewed licenses described in Attachment 1 issued after January 31, 1992. It should be applied immediately to all amendments explicitly dealing with interim waste storage.


 Ronald R. Bellamy, Chief
 Nuclear Materials Safety Branch
 Division of Radiation Safety
 and Safeguards

Enclosures:

Attachment 1: Types of Licensees which Require Waste Storage Plans
 Attachment 2: Waste Storage License Conditions
 Information Notice No. 89-13
 Information Notice No. 90-09
 Policy and Guidance Directive FC 90-03, dated March 29, 1990

cc:

J. Glenn, NMSS
 M. Lamastra, NMSS
 C. Hosey, RII
 J. Grove, RIII
 W. Fisher, RIV
 R. Pate, RV

ATTACHMENT 1

PROGRAM CODES WHICH REQUIRE WASTE STORAGE PLANS

<u>Licensee Type</u>	<u>Program Code</u>
Academic Type A Broad	01100
Academic Type B Broad	01110
Academic Type C Broad	01120
*Medical Institution Broad	02110
Manufacturing and Distribution Type A Broad	03211
Manufacturing and Distribution Type B Broad	03212
Manufacturing and Distribution Type C Broad	03213
Manufacturing and Distribution Other	03214
Nuclear Laundry	03218
Waste Disposal (Burial)	03231
Waste Disposal Service Prepackaged Only	03232
Waste Disposal Service Incineration	03233
Waste Disposal Service Processing and/or Repackaging	03234
Research and Development Type A Broad	03610
Research and Development Type B Broad	03611
Research and Development Type C Broad	03612
Research and Development Broad-Multisite-Multiregional	03613
Research and Development Other	03620
Source Material Military Munition Testing	11210
Source Material Other Greater than 150 Kilograms	11300
Source Material	11800

*Other medical licenses which authorize activities not covered by Part 35 (Medical use of byproduct material) should be evaluated for the need for a waste storage plan.

12/1/91

ATTACHMENT 2

WASTE STORAGE LICENSE CONDITIONS

1. Time Limit License Condition (No Waste Storage Plan)

The licensee shall not store licensed material contained in waste for more than two (2) years from the date the waste is put into storage. The licensee shall maintain records which indicate the date that licensed material contained in waste is put into storage. This condition does not apply to licensed material intended for disposal by decay-in-storage pursuant to 10 CFR 35.92 or other conditions of this license.

2. Waste Storage Plan License Condition

Radioactive waste generated under this license shall be stored in accordance with the statements, representations, and procedures included with the licensee's waste storage plan described in the licensee's letter dated _____.

PARAGRAPH EXPLAINING TIME LIMIT

Your license has been amended to limit the time that you may store radioactive waste. Due to the possibility that licensees may be denied access to burial sites, licensees who do not have approved waste storage plans are being prohibited from storing radioactive waste for more than two (2) years. This storage time limitation should be sufficient to support normal operations. If you desire to have this condition removed from your license and be permitted to store waste for a longer time period you should submit a request to amend your license containing the information contained in NRC Information Notice No. 90-09.

12/1/91

ATTACHMENT 3

WASTE STORAGE LICENSE CONDITIONS

1. A. Time Limit License Condition (No Waste Storage Plan)

The licensee shall not store licensed material contained in waste for more than two (2) years from the date the waste is put into storage. The licensee shall maintain records which indicate the date that licensed material contained in waste is put into storage.

B. PARAGRAPHS EXPLAINING TIME LIMIT

Your license has been amended to limit the time that you may store radioactive waste. If you desire to have this condition removed from your license you should submit a request to amend your license. Guidance on the information necessary to approved such a request is contained in NRC Information Notice 90-09 (copy enclosed).

2. Waste Storage Plan License Condition

Radioactive waste possessed under this license shall be stored in accordance with the statements, representations, and procedures included with the licensee's Waste Storage Plan described in the licensee's letter (or application) dated _____.

FACSIMILE REQUEST

Date April 8, 1992

MESSAGE TO: JIM KENNEDY, NMSS

LLWD

TELECOPY NUMBER: _____

NUMBER OF PAGES: 9

INCLUDING THIS REQUEST FORM

MESSAGE FROM: Richard W. Cooper, Director, DRSS

U S N R C REGION I KING OF PRUSSIA, PENNA.

TRANSMITTED BY: Connie, FTS 346-5274

DATE & TIME: 1:15 pm

VERIFIED BY: _____

RI

URGENT!!