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Note to Files

DEEP WELL INJECTION CRITERIA - DISCUSSION WITH EPA ON 3/15/72

The subject meeting was held at EPA Headquarters for the purpose of discussing general criteria for acceptable deep well injection systems as a means of disposing of liquid or gaseous streams containing short lived radioactive isotopes. In attendance were:

EPA

Dave Smith, Chief
Application Review Branch
Criteria Standards Division

Craig Roberts, Chief
Technology & Impact Review Branch
Technical Assessment Division

E. David Harvard, Director
Technical Assessment Division

Elmer Baltz, Geologist
Technical Assessment Division

AEC

Homer Lowenberg, Special Assistant
to Director - Engineering
Division of Materials Licensing

R. B. Chitwood, Chief
Irradiated Fuels Branch
Division of Materials Licensing

John V. Nehenias, Chief
Radiological Protection Branch
Division of Radiological and
Environmental Protection

The discussion was not particularly fruitful. EPA has apparently not done anything toward developing general criteria for acceptable injection systems. They recognize the paucity of guidance in this field, but our impression is that they do not plan to become active in developing standards at this time. The view was expressed that with respect to AEC projects our best approach would probably be to identify the specific uses contemplated for deep well injection and balance the merits of this approach with alternative methods of disposal and after doing so, proceed through our review process as we normally do. Mr. Baltz persists with the basic position that to do nothing is the best approach because by doing something we may later wish to extend this to other uses which he feels should not be done even if future knowledge would seem to suggest its overall merits.

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Our conclusions relate to short term and long term considerations. First, we should deal with our specific applications, evaluating the safety ramifications for each in using deep well injection for disposal of low level radioactive waste streams. Each application should be considered, balancing it with the merits of other alternatives available for the specific application. In proceeding through our review and approval process EPA would have an opportunity to comment on the Draft Environmental Statement which we would provide for this purpose in each case. I do not plan further discussion of this subject with EPA at this time.

From the long range view, it is apparent from our discussions that DML should take the following course:

1. Consider what radioactive isotopes are being discharged or planned to be discharged into the biosphere from nuclear fuel cycle facilities, such as tritium, krypton, ruthenium, etc.
2. Have an outside consultant group, such as a National Lab, analyze alternative means for handling these wastes that are better than release to the biosphere.
3. Get recommendations for "better" disposal methods. (Deep well injection could fit this context.)
4. Based on 2. and 3. above, proceed to develop criteria to implement these improved schemes.

Original signed by:

R. B. Chitwood

R. B. Chitwood, Chief
Irradiated Fuels Branch
Division of Materials Licensing

cc: S. H. Seiley, DML
C. K. Beck, DR
L. Rogers, REP
R. L. Cunningham, DML
C. E. Grove, DML

Original Signed by:

H. Lowenberg

Robert Lowenberg
Special Assistant to the Director -
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