**LOW-LEVEL RADIOACTIVE WASTE FORUM, INC.**

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**Disused Source Working Group Meeting**

**Courtyard Marriott Hotel**

**2592 Laning Road**

**San Diego, California 92106**

## February 6-7, 2017

**Draft Agenda**

**February 6, 2017**

9:00 am - 5:00 pm (Open to Working Group Members, Staff and Organizational Liaisons)

• introductions *(DSWG Members, Staff and Organizational Liaisons)*

• review and approval of agenda items *(DSWG Members, Staff and Organizational Liaisons)*

• new developments since fall working group meeting *(Todd Lovinger, DSWG Project Director)*

* review and discussion of the *Federal Register* notice, dated January 9, 2017, in which the U.S. Nuclear Regulatory Commission (NRC) announces that the agency is seeking input from licensees, Agreement States and the public to inform the staff’s assessment of potential revisions to regulations or processes requiring Category 3 source protection and accountability
* discussion of coordinated response to specific questions that NRC has developed to assist the agency in its analysis (deadline March 10, 2017)

• development of educational materials for current and prospective licensees *(Discussion Leader—Mike Klebe, DSWG Financial Assurance Consultant)*

* brochures: organizational outreach re brochures, transmittal letters and accompanying cost disposal document; distribution to federal, state, industry and other stakeholders; printing of DSWG versions of brochures and accompanying documents
* draft source disposal cost document: development, comments and next steps including potential distribution of draft document to industry stakeholders for comment
* discussion and decision-making

• source calculation and methodology re number of sealed sources *(Discussion Leader—Gary Robertson, DSWG Technical Consultant)*

* information gathered from state programs
* ideas for further information gathering (note questions in NRC *Federal Register* notice)
* discussion and decision-making

• draft chart of compact import/export authorities *(Discussion Leader—Mike Klebe, DSWG Financial Assurance Consultant)*

* inclusion of NORM and TENORM information
* outstanding items and distribution to stakeholders
* discussion, decision-making

• development of regional workshops for stakeholders interested in management and disposition of sealed sources and radioactive devices *(Discussion Leader—Todd Lovinger, DSWG Project Director)*

* overview of proposed outline re topics and potential speakers
* responses from compacts re interest and support
* discussion and decision-making

*Lunch Break*

• outreach by designated organizational liaisons and feedback received on the outstanding recommendations from the March 2014 DSWG report

* Conference of Radiation Control Program Directors *(Discussion Leader—Denny Galloway)*
* Organization of Agreement States *(Discussion Leader—Jennifer Opila)*
* Health Physics Society *(Discussion Leader—Craig Little)*

• charting a path forward: item-by-item review of outstanding recommendations *(DSWG Members, Staff and Organizational Liaisons)*

1. To encourage timely disposal, the NRC should develop robust financial assurance requirements for all licensees (Categories 1 through 3). The financial assurance requirements should be adequate to cover the entire cost of packaging, transport and disposal.
2. Create a program, possibly through the CRCPD, to educate proposed buyers of sealed sources about the life-cycle costs of sealed sources, including information about the cost of storage, transportation and disposal.
3. Now that disposal access is available for most sources in the U.S., the NRC and the Agreement States should expand and make enforceable the General License (GL) storage limit regulation to address all Category 1 through 3 sources in storage for more than two years unless the licensee can make a clear demonstration of future use. There should be clear regulatory authority to direct the disposition (reuse, recycle or disposal) of Category 1 through 3 sources after they have been stored for two years.
4. The NRC should amend its regulations to require a Specific License (SL) for all Category 3 sources.
5. The NRC and Agreement States should incorporate procedures in their inspection programs to review the status of Category 1 through 3 sources in storage—including consideration of the length of, reason for, and location of storage.
6. NNSA should identify several foreign package designs for Type B shipping containers that would have widespread applicability to a number of disused sources in the United States. NNSA should submit applications to have these packages certified by the NRC for domestic use.
7. A secure “source exchange” program should be created and administered via an intermediary—possibly by the EPA due to their experience in exchange programs for other resources such as hazardous materials—to work with licensees, source and device manufacturers, and recyclers to provide them with information about sources still having a useful life, with the goal of increasing beneficial reuse and recycle opportunities. The program could identify sources meeting the specific application requirements being sought for reuse or recycling, identify sources containing radioisotopes that can be removed and used to manufacture new sources, and assist with paperwork required for source transfer.
8. A detailed study should be conducted—possibly by the U.S. Environmental Protection Agency (EPA) due to their long history of working with reuse and recycling of resources—to identify measures to promote opportunities for the reuse and recycling of sources.
9. The NRC and Agreement States should enhance the NSTS to include as a required field the date last used of all sealed sources. These data should be validated during routine inspections.
10. To prevent the accumulation of an excessive number of sources by manufacturers and suppliers, the NRC and Agreement States should require manufacturers and suppliers to dispose of those sources that have no recycle or reuse value on an annual basis.
11. Federal research agencies should encourage grantors to give preference to applicants proposing to use sealed sources from their existing inventories or alternative technologies; and require applicants to budget for the full life-cycle cost of use and disposition in grant applications.

*Meeting Adjourned*

**February 7, 2017**

9:00 am - 12:00 pm (Open to Working Group Members, Staff and Organizational Liaisons)

• continued discussion re prior day’s agenda topics *(DSWG Members, Staff and Organizational Liaisons)*

* development of a coordinated response to specific questions that NRC listed in the January 9 *Federal Register* notice (deadline March 10, 2017)
* outreach re educational materials for current and prospective licensees and finalization of draft source disposal document
* researching source calculation and methodology re number of sealed sources and considering updating of the information on the universe total number and types of sources
* reviewing and discussing next steps re draft chart of compact import/export authorities
* development and compact support for regional workshops
* gathering input from organizational members and developing path forward re updated list of DSWG recommendations and priorities as per current status and input from state radiation control program directors

• the path forward—working together to improve the proper management and disposition of disused sources *(DSWG Members, Staff and Organizational Liaisons)*

* identifying areas of agreement
* developing and coordinating options for implementation
* providing input to federal regulatory authorities and the Radiation Source Protection and Security Task Force (RSPSTF)

• additional outreach to and coordination with other stakeholders *(DSWG Members, Staff and Organizational Liaisons)*

* Waste Management Symposia in Phoenix, Arizona from March 6-9, 2017
* Conference of Radiation Control Program Directors (CRCPD) annual meeting in Scottsdale, Arizona from May 8-11, 2017
* Organization of Agreement States (OAS) annual meeting in Memphis, Tennessee from August 21-24, 2017
* National Council on Radiation Protection & Measurements
* other stakeholders including medical community and licensees; brokers and processors; and, licensees (e.g., academic, industry, etc.)

• other outstanding issues and considerations *(DSWG Members, Staff and Organizational Liaisons)*

* planning and input for next Radiation Source Protection and Security Task Force report, due in August 2018
* potential revisions to DSWG materials (e.g., poster, brochure, talking points, etc.)

• proposed action items and follow-up tasks; other DSWG meeting dates and locations; and, planning for spring 2017 meeting *(DSWG Members, Staff and Invited Guests)*

* proposal to meet with officials from federal agencies and legislators

*Meeting Adjourned*