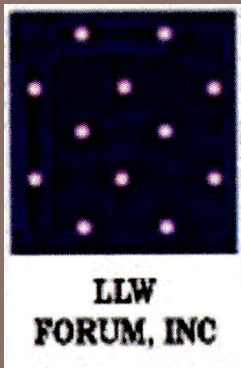


# **LOW-LEVEL RADIOACTIVE WASTE FORUM, INC.**

## **Disused Sources Working Group**

### **Implementation Phase**



# Working Group Members

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- **Kathy Davis** – Southwestern Compact
- **Leo Drozdoff** – Nevada Department of Conservation and Natural Resources
- **Ray Fleming** – Texas Department of State Health Services (**Chair**)
- **Mike Garner** – Northwest Compact
- **Leigh Ing** – Texas Compact
- **Rich Janati** – Pennsylvania Department of Environmental Protection
- **Susan Jenkins** – South Carolina Department of Health and Environmental Control
- **Rusty Lundberg** – Division of Radiation Control, Utah Department of Environmental Quality
- **Mike Mobley** – Southeast Compact
- **Leonard Slosky** – Rocky Mountain Compact

# Source Disposal is Important

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**No matter how you reach that conclusion sources eventually need to be buried.**



# Lack of Planning

4

- ❑ Many Licensees do not plan for disposal or do not dispose of sources in a timely manner
- ❑ **Excuses - “planned” reuse, disposal too costly, shipping problems, procrastination**

Never put off  
til tomorrow



what you  
can do t

# Life Cycle Cost Education

5

- **Ask questions when licensing or inspecting.**
  - **What Waste do they have?**
  - **Who receives their waste?**
  - **How much does disposal cost?**
  - **What is the funding source?**
  - **When will it happen?**
  - **What happens with the last sources that they cannot exchange 1-for-1?**



# Life Cycle Cost Outreach

6

- **An organized outreach program by:**
  - ▣ **NRC, NNSA and States**
  - ▣ **CRCPD or HPS**
- **Topics**
  - ▣ **Why is disposal necessary**
  - ▣ **Costs of disposal – Some realistic numbers would be great**
  - ▣ **Disposal Choices - Manufacturers, Brokers, OSRP, SCATR**
  - ▣ **Encourage Disposal**



# OSRP and SCATR



- Continue to support both programs
- Find ways to make them even more successful in your state.



# Add New Disposal Funding Options

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- ❑ **Manufacturer/Waste Broker Pre-Payment Plans**
- ❑ **State Pre-Payment Plans**
- ❑ **State Disposal Funds**
- ❑ **State Orphaned Source Recovery Programs**
- ❑ **Other Ideas?**



# Reassess Financial Assurance

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- ❑ **\$113,000 will not cover every licensee with sealed sources above financial assurance activity limits. (10 CFR §30.35(d))**
- ❑ **\$113,000 may not even cover licensees who do not need financial assurance by rule. (ex. 100,000 Curies Cs-137)**
- ❑ **Financial assurance must accurately reflect disposal costs.**



# Fees to Encourage Disposal

10

- ❑ **Licensing Fees Per Source**
- ❑ **Storage Fees**
- ❑ **Other Ideas?**





# Storage Time Limits

11

- **Make a 2-year disposal time limit the rule.**
- **Make it 1 year for manufacturers, distributors, service companies and brokers.**
- **Enforce the two year limit for GLs.**
- **Require formal plans of reuse or recycling for those who seek to avoid the time limits.**

# Support Reuse and Recycling

12

- **Allow individual licensees to reuse and recycle when they have an approved plan.**
- **Promote the exchange of usable sources intended for reuse and recycle.**
- **Promote an active Source Exchange Program when one becomes available.**



# States with Waste Disposal Sites

13

- ❑ Implement the revised concentration averaging BTP when it becomes official.
- ❑ Consider new higher limits under site specific criteria.



# What we ask is:

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- ❑ **Please read the disused source working group recommendations with an open mind.**
- ❑ **Support the ones you agree with.**
- ❑ **Coordinate with the DSWG on those recommendations.**
- ❑ **Take actions at the state level to implement those within your control.**

Download the report at <http://www.llwforum.org>

