

Category	Rec. #	Recommendation
Licensee Education	1a	Develop reuse/recycling education program
Licensee Education	2a	Develop lifecycle education program
Licensee Education	16a	Encourage licensees to use Texas and other waste sites
Licensee Education	16b	Promote CRCPD SCATR Program
Licensee Education	24	NNSA funding for CRCPD lifecycle cost education progr
Rulemaking	4	SL for all Category 3 sources
Rulemaking	7	Update financial assurance requirements
Rulemaking	9	Fees to encourage disposal
Rulemaking	10b	2-year storage limit rule
Polycymaking	2b	Licensee acknowledge lifecycle responsibilit
Polycymaking	10a	Enforce 2-year GL storage limit
Polycymaking	11	Inspect for disused sources in storage
Polycymaking	12a	Manufacturers should dispose of sources annually
Polycymaking	13c	Develop policies on recycling operations
NRC Polycymaking	5	Add Category 3 sources to NSTS
NRC Polycymaking	6	Require use of storage field in NSTS
NRC Polycymaking	12b 13a 13b	Greater controls on importation of disused foreign sourc
Disposal Programs	8a	Continued funding of CRCPD orphaned/SCATR prograr
Disposal Programs	8b	Encourage state run orphaned source programs
Disposal Programs	23	Continued funding for OSRP
Reuse/Recycling	15	Develop a source exchange program
Research Study	14	Study on reuse/recycling of sources
Research Study	22	DOE marketing study on Type B Containers
Type B Containers	19	Identify and certify foreign Type B containers
Type B Containers	20	1-year notice to licensees of container expiration
Type B Containers	21	Streamline Type B container review process
Alternative Tech.	1b	Develop and promote alternative technologies
Alternative Tech.	1c	Develop incentives to use alternative technologies
Grant Procedure	3a	Grant providers encourage recycling/alternatives
Grant Procedure	3b	Grant applications include full lifecycle costs
State Licensing	17	Waste sites and host states should adopt the CA BTP
TX State Law	18	Continued out of compact disposal at the Texas site

Key Organizations**Implementation Strategy**

NRC, States, CRCPD?	Promote NRC, State and CRCPD outreach to licensees
CRCPD, NRC, States	Promote NRC, State and CRCPD outreach to licensees
NRC, States	Promote NRC, State and CRCPD outreach to licensees
NRC, States, CRCPD?	Promote NRC, State and CRCPD outreach to licensees
NNSA, CRCPD	Ask NNSA about funding the CRCPD part of the outreach program
NRC, states	Promote reintroduction of rulemaking to limit GL source activity
NRC	Support task force/NRC process, provide comments
NRC, States	Promote new fees per source and/or fees for sources in storage
NRC, States	Promote a new rule putting time limits on storage
NRC, States	Promote revisions to NRC and state licensing procedures
NRC, States	Promote documentation of storage and rule enforcement
NRC, States	Promote changes to NRC and state inspection procedures
NRC, States	Promote revisions to NRC and state license review procedures
NRC, States	Promote development of NRC and state source recycling policies
NRC	Encourage NRC to reconsider implementation
NRC	Encourage NRC to consider making it a requirement
NRC	Encourage NRC to reconsider guidance on foreign source exchanges
NNSA	Confirm with NNSA and CRCPD that funding is continuing
States	Promote the development of state orphaned source programs
DOE/NNSA	Confirm with DOE/NNSA that funding is continuing
EPA, NNSA, NRC, CRCP	Discuss implementation strategies with key stakeholders
EPA, or NRC or NNSA	Meet with key organizations about performing a survey Ask the DOE/NNSA to conduct the study
NNSA, DOT, NRC	Encourage the NNSA to perform the study, and start the certification process
DOT, NRC, States	Promote the development of a system to identify pending expirations, and no
DOT, NRC	Promote a streamlined review process for new and foreign packages
NNSA	Support the existing NNSA programs and implementation plans
NNSA	Support the NNSAs development of incentive programs
NNSA, grant agencies	Ask the NNSA to develop guidance for agencies awarding grants
NNSA, grant agencies	Ask the NNSA to develop guidance for agencies awarding grants
Sites and States	DSWG members in licensing states should promote adoption of the BTP
TX Legislature	Texas members respond to information requests as appropriate

Complete Partially Complk In Process Commitment Discussions Presentations Not Started

X
X
X
X
X

X

Some States

states?

states?

X

X
X
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X

Texas proposed | States?

Texas proposed | States?

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Some States

states?

states?

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itify stakeholders

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Texas

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X

X

DSWG Priorit Implementation notes

High	Ask the states about what they do in state survey, roll the education programs all together
High	Ask about existing state programs in state survey, meet with NRC, meet with CRCPD board, pr
High	In survey ask the states what they are doing, meet with NRC, Meet with CRCPD, Add informati
High	In survey ask states what they are doing to promote the SCATR program, meet with NRC, pron
High	Meet with NNSA, develop a program scope and outline costs, brochure development, posters?
Med	Include in state survey to gauge state support and determine which already require a SL, Meet
High	The 2014 task force reestablished this recommendation for the NRC to work on
High	Include in state survey to gauge state support and existing fees of this type, meet with NRC, pe
High	Include in state survey to gauge state support or state plans to implement, Meet with NRC, Peti
High	Include in state survey to gauge state support and existing procedures, easy to implement by a
High	Include in state survey to gauge state support and plans for or existing programs, meet with NF
High	Include in state survey to gauge state support and see if there are existing procedures in place,
Med	Include in state survey to gauge state support, Meet with NRC, the 2-year disposal limit essenti
Med	The scope of this recommendation should be broadened beyond the foreign source issue to mi
Low	Include in state survey to gauge state support, Meet with NRC, the NRC recently rejected this s
Low	The NRC asked licensees to use it voluntarily which is a success, but there is resistance to mal
Low	Meet with NRC, since NRC guidance is recent they may not be willing to reconsider it for sever
Low	Funding authorized through 2014-2015 collection period
Med	In state survey ask about existing state run programs or plans to implement one, outreach with
Low	Confirm with DOE/NNSA
Med	Continued meetings to find funding, an appropriate host and security tie-ins
Med	Meetings, parallel efforts to promote recycling should continue even if there is no study
Med	Meet with DOE/NNSA
High	Meet with NNSA
Low	Meet with DOT and NRC about developing a notification program, Problem - DOT does not kno
High	Meet with DOT and NRC, discussed at LLW Forum fall meeting
Med	Obtain updates form NNSA and determine ways to advance their projects.
Med	Obtain updates form NNSA and determine ways to advance their projects.
Low	Meet with the NNSA
Low	Meet with the NNSA
Med	Discussions of meetings with site managemnt and the site licensing agencies once the CA BTF
Low	No change is anticipated based on the recent election outcome nor in the immediate future

present at CRCPD
link to the LLW Forum website
note in presentations, and information to LLW Forum website
, mailouts etc...

with NRC, Petition for rulemaking? the NRC recently rejected a 10% of category 3 rule change so it may be

petition for rulemaking?
petition for rulemaking?

improving licensing procedures, develop sample regulatory guide information? Or, find a state that has a good
RC, can be implemented by procedure or with the help of additional rulemaking, CRCPD presentation
, Meet with NRC, state outreach at CRCPD meeting
initially forces manufacturers to submit a disposal plan where this can be addressed, most easily implemented
minimize "shame recycling" while promoting actual recycling, meet with NRC, state survey?, CRCPD present:

so it is on a longer timeline
making it mandatory
several years

OAS/CRCPD

how when a certificate holder will ask for recertification

is formally approved

on a longer timeline

example.

by license condition , CRCPD presentation
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