

LOW-LEVEL RADIOACTIVE WASTE FORUM, INC.

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Disused Source Working Group Assigned Priorities for March 2014 Report Recommendations As of February 2016

PRIORITY LEVEL (Current DSWG Rankings)	RECOMMENDATION	PRIORITY LEVEL (DSWG July 2015 Meeting)	PRIORITY LEVEL (DSWG-CRCPD Joint Survey)
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.	High	High
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.	Med-High	High
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.	Med-High	Med-High

PRIORITY LEVEL (Current DSWG Rankings)	RECOMMENDATION	PRIORITY LEVEL (DSWG July 2015 Meeting)	PRIORITY LEVEL (DSWG-CRCPD Joint Survey)
4.	The NRC should amend its regulations to require a Specific License (SL) for all Category 3 sources.	Med-High	Med-High
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.	Med-High	Med-High
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.	Med	High
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.	Med	Med-High

PRIORITY LEVEL (Current DSWG Rankings)	RECOMMENDATION	PRIORITY LEVEL (DSWG July 2015 Meeting)	PRIORITY LEVEL (DSWG-CRCPD Joint Survey)
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.	Med	Med-High
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.	Med-High for States only	Med-High for States only
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.	Med-Low	Med-High
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.	Low-Med	Med-High