HPS-GAO INTERACTIONS ON ISSUES RELATED TO LOW-LEVEL RADIOACTIVE WASTE

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In September, 2004, HPS submitted written public witness testimony to SE&NR hearing on low-level radioactive waste oversight.

Reviewed the June 2004 GAO report on LLRW.

Offered suggestions for LLRW disposal:
- Predictable long-term disposal of Classes B and C wastes
- Lack of options impact programs for safeguarding sealed sources
- Lack of competition for Class A waste → high $$$
SUGGESTIONS (continued)

– Integrated framework for managing and disposing of LLRW
  • EPA ANPR → RCRA Subtitle (c) for LLRW and LAMW
  • How to harmonize waste regulation (LAMW, AEA, TENORM, D&D wastes)?

– Support for NRC rulemaking for “Controlling the Disposition of Solid Materials”

– Non-regulatory alternatives to commercial LLRW disposal for certain materials
GAO FOLLOW UP

• Senate E&NR Committee tasked GAO for follow-up report
• GAO requested HPS response to questions relating to testimony
• Met with Dr. T. Laetz, senior policy analyst et al. at LANL (January 2005)
• Submitted written response to GAO questions by 1 March 2005
• Posted on HPS Web site (members only)
GENERAL PRINCIPLES

• Waste classification and disposal should be risk-based
• Risk-informed waste disposal should be consistent and integrated with disposal of nonradioactive waste of comparable hazard
• Endorse the approach in NCRP 139 “Risk-Based Classification of Radioactive and Hazardous Chemical Wastes”
• Risk-based disposal options support alternatives beyond those currently legislated
PRINCIPLES (continued)

- From security perspective, disposal better option than storage
- Orphan sources can be public health and safety concern
- Orphan sources are tied to waste disposal when availability or cost inhibit proper disposal.
POSITIONS AND RECOMMENDATIONS

• Congressional action needed to grant access to all 50 states.
  – Likely that 36 states ≠ Atlantic Compact will not have access for Classes B and C wastes after 2008
  – Access of LLRW at a DOE-controlled facility
  – Commercial development and licensing of a new facility
  – NRC-EPA options for creating new disposal capacities for variety of waste streams
• Encourage Congress to obtain stakeholder input of ways to reclassify waste based on risk
• Continue funding for existing orphan source recovery programs (DOE, NRC, States)
• Legislation for uniform control for safety and security of discrete radioactive sources not under AEA 1954 (HPS-OAS Position)
POSITIONS AND RECOMMENDATIONS (continued)

• Allow permanent disposal of GTCC waste at WIPP, with stakeholder involvement
• High cost of waste disposal impeding use of nuclear technologies that benefit society
  – Responses to EPA ANPR
    • University of California
    • National Institutes of Health
    • CORAR
    • State of Nebraska
SUMMARY POINTS

• A risk-based framework for waste classification and disposal
  – Integrates with other hazardous materials

• A range of disposal options
  – Federal land
  – Facilities
  – Agencies (primarily DOE)
  – Commercial options

• NRC control of all materials