

From: [Tiktinsky, David](#)
To: [Malek, Elise](#)
Cc: [Schwartzman, Adam](#); [Tobin, Jennifer](#); [Zimmerman, Jacob](#); [McKenney, Chris](#); [Donnelly, Patrick](#)
Subject: REQUEST FOR ADDITIONAL INFORMATION RELATED TO WESTINGHOUSE ELECTRIC COMPANY, LLC, EXEMPTION REQUEST FOR ALTERNATE DISPOSAL OF SPECIFIC WASTE (ENTERPRISE PROJECT IDENTIFIER L 2021-LLA-0101)
Date: Monday, September 13, 2021 1:52:00 PM

Ms. Elise Malek
Licensing Manager
Westinghouse Columbia Fuel Fabrication
5801 Bluff Road
Hopkins, South Carolina 29061-9121

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO WESTINGHOUSE ELECTRIC COMPANY, LLC, EXEMPTION REQUEST FOR ALTERNATE DISPOSAL OF SPECIFIC WASTE (ENTERPRISE PROJECT IDENTIFIER L-2021-LLA-0101)

Dear Ms. Malek:

On June 1, 2021, Westinghouse Electric Company, LLC (WEC) submitted an alternate disposal request (ADR) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21153A001) per Title 10 of the *Code of Federal Regulations* (10 CFR) Section 20.2002, "Method for obtaining approval of proposed disposal procedures," for the disposal radioactive materials containing byproduct material and special nuclear material (SNM) from the Columbia Fuel Fabrication Facility (CFFF).

The request seeks approval for the shipping and disposal of multiple individual shipments of volumetrically-contaminated and surface-contaminated wastes over a 5-year period (2021 – 2025). WEC proposed to use bounding dose calculations with corresponding volume limits based upon the annual U. S. Ecology Inc. (USEI) worker exposure limits as the basis for determining whether individual shipments are acceptable for disposal.

The 10 CFR 20.2002(a) requires that an ADR application include "[a] description of the waste containing licensed material to be disposed of, including the physical and chemical properties important to risk evaluation."

Request for Additional Information

Consistent with Westinghouse's past ADR applications, characteristic waste information, such as the waste's radiological content, mass, location, volume, and homogeneity facilitates the NRC staff's review. Please provide specific information regarding the waste intended for disposal at USEI to meet the specific requirements outlined in 10 CFR 20.2002(a),

- (a) A description of the waste containing licensed material to be disposed of, including the physical and chemical properties important to risk evaluation, and the proposed manner and conditions of waste disposal.

Discussion

Sections 4.1, "Volumetrically Contaminated Waste," and 4.3, "Surface Contaminated Waste," of WEC's submittal include the statement "includes, but is not limited to" in describing the various waste forms that would be shipped to USEI under this request. The use of this phrase provides for the inclusion of materials not described in the ADR. In addition, the application refers to different sources or types of waste and licensed material for disposal, but not the specific waste and material to be disposed. Including additional, unspecified materials or only classes of materials does not satisfy 10 CFR 20.2002(a). To satisfy the requirements in 20.2002(a), specific information related to the waste proposed for disposal, including the volumes of material and other specific characteristics that could impact risks associated with the proposed disposal action should

be included.

Basis

The regulations provided in 10 CFR 20.2002 were established to provide licensees with a process by which they can propose alternate disposal options for use in place of specific disposal regulations established in the regulations (e.g., 10 CFR 20.2001, "General requirements," and 10 CFR Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste"). Use of alternate disposal procedures may reduce overall risk (e.g., risk associated with increased transportation distances and associated radiological and no-radiological impacts) and may preserve disposal capacity at low level waste disposal facilities for higher risk waste streams, while also providing reasonable assurance of adequate protection of public health and safety and protection of the environment. To ensure that these criteria can be met, the licensee is required to submit for review and approval sufficient detailed information that satisfies the requirements in 10 CFR 20.2002.

In accordance with Title 10 of the *Code of Federal Regulations*, Section 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this email will be available electronically for public inspection in the NRC Public Document Room, or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room). If you have any questions regarding this communication, please contact me at 301-415-8740 or by email at David.Tiktinsky@nrc.gov.

Sincerely,

David Tiktinsky, Senior Project Manager
Fuel Facility Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No. 7001151
License No. SNM-1107

cc: westinghouse@listmgr.nrc.gov

*via email

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