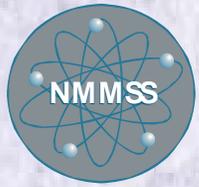


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Waste Reporting in NMMSS

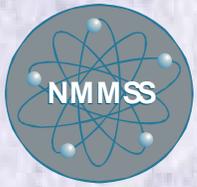
Peter Dessaules
NMMSS Program Director



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The Importance of Documenting Waste Transfers Consistently

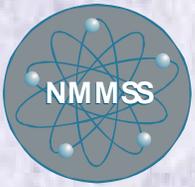
- When sites are decommissioned ALL RISs need to have a ZERO balance including “V” and “H” RISs
- Differences between databases has proven problematic for DOE in the past, especially when differences are not satisfactory explained
- Optional reporting is tantamount to no reporting—values can’t be trusted or reported
- Waste is *nuclear material* and needs to be reported accurately and consistently for data calls; the question is how and who has ultimate responsibility?



Current DOE Situation from a NMMSS Perspective

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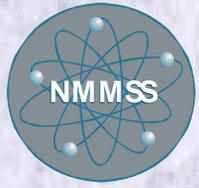
- Inter site waste
 - Discards to atmosphere (29 “A” RISs)
 - Discards to ground (15 “G” RISs)
 - Discard to holding areas (24 “H” RISs)
 - Treatment, storage, and disposition (1 “I” RIS)
 - Burial grounds (23 “V”)
 - Consumed in use (3 “R”)
- Intra site waste
 - Low-level waste to NRC sites
 - Low-level waste to other DOE sites
 - High-level Defense waste to Waste Isolation Pilot Plant
 - High-level radioactive waste and spent nuclear fuel to Yucca Mountain Project



Differences in DOE and NRC Reporting Requirements

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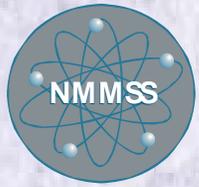
- NRC does not recognize “waste” as a separate form it is just nuclear material.
- NRC requires reporting on only SNM and obligated source material
- At NRC it is part of MC&A
- At DOE waste is a special form that in certain cases shipment does not have to be reported.
- DOE requires reporting on SNM, source, and seven other special materials.
- At DOE it is not part of MC&A



Regulations Governing Waste Shipments

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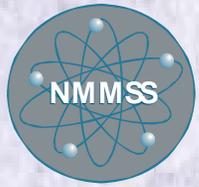
	DOE Receiver	NRC Receiver
DOE Shipper	Optional under DOE Manual	NUREGS and DOE Manual
NRC Shipper	NUREGS	NUREGS



Implications of Conflicting Waste Policy on NMMSS Accuracy

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- Inter Site Issues
 - NMMSS inventories for all waste RISs are highly inaccurate and should not be used to answer inquiries
- Intra Site Issues
 - For shipment to NRC sites, DOE sites may be required by the receiver to do more than their NRC counterparts
 - Policy interpretation rests with receiver



Policy Changes Under Consideration

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- Reduce DOE requirements for match NRC NUREGS for transfers to NRC facilities (SNM and obligated source material only)
- Deactivate “A” and “G” RISs – they don’t really meet the definition of a RIS.
- Track air and ground discards through Use codes
- Consider having NMMSS accept alternate submissions for processing waste shipments.
- Other suggestion or comments????