



Texas Low Level Radioactive Waste Disposal

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Presentation Overview

- Who Are We
- What We Do Not Do
- Questions For The Generator
- Review of Import Applications
- Watching Capacity
- Technical Position Paper

Who We Are

- Congressionally created to efficiently manage the disposal of low-level radioactive waste.
 - While subject to Texas Sunset Review the Compact is not a state agency.
- Texas and Vermont are party states.
 - 8 Commissioners: 6 Texas (1 from Andrews County) and 2 from Vermont
- The waste facility is privately operated by Waste Control Specialists in Andrews County Texas.

What We Do Not Do

- The Texas Low Level Radioactive Waste Disposal Compact Commission has no involvement with high level radioactive waste. The authority over the interstate commerce of high level radioactive waste has not been granted to any agency except the Nuclear Regulatory Committee.
- The Department of State Health Service monitors compliance with transportation and some licensure of generators of waste.
- The Texas Commission on Environmental Quality monitors radioactive materials, licensure and permits the disposition and storage of waste and materials.
- If you generate low level radioactive waste in Texas, you do not need to contact the TLLRWDCC. Contact a broker or Waste Control Specialist and dispose of your waste at the sight.

Questions for the Generator

Is the waste eligible for disposal at the Compact Waste Facility in Texas?

Where do you plan to send the waste for disposal?

If you plan to send the waste outside of Texas, you must obtain export authorization from the Texas Low Level Waste Disposal Compact Commission.

Have you reached an agreement with Waste Control Specialists for disposal?

Waste Imports

- To bring waste into Texas a waste generator or broker must apply and receive approval from the Commission
 - Applications are via a form on our website. Once the application is sent, we:
 - Post the form on our website for public comment
 - TCEQ reviews the petition
 - Our Technical Committee reviews the application
- Applications are approved at Commission meetings that are held every 6 to 8 weeks
- Once approved importers of waste sign an agreement with the TLLRWDCC with specific terms for amount, timelines and material allowed.

Review of Import Applications

- Submit the application via the electronic portal
 - Helps ensure application is received before deadline (35 days)
 - Prevents any mail receipt issues
- Received application is posted to Commission website and is available to the Technical Committee for review
- Technical Committee review includes:
 - General info - name, address, signature, no violations/problems with Commission or other regulatory agencies, no international waste, is the application fully completed, etc
 - Is this a broker application
 - What business sector(s)

Import Review – cont'd

- Have they requested a different disposal period
- Do the volume, Curies, and waste description make sense
- Does the request include irradiated hardware
 - If >15,000 Curies – no other waste streams and conditional approval
- Is this only sealed sources
- Where and from whom is the waste coming
 - Does the associated Compact(s) require export authorization
 - Broker – have they provided needed export authorizations/generator authorizations
- Are they requesting small quantity generator status
 - Nuclear power facility waste is preempted
- Has the Commission received any comments
- If this is an amendment request, have they provided an explanation

Watching Capacity

- We closely monitor the amount of waste stored at the Compact Waste Facility to ensure availability for in compact generators sufficient space for waste generated in the compact states.
- We keep track along with TCEQ of installed and licensed capacity with adherence to the Texas and federal statutes to protect the interests of the compact states and waste generators.

What other TLLRWDCC Committees might have a role in petition approvals?

- Rules Committee - as new rules or rule revisions occur
- Technical Committee – Reviews all petitions and makes recommendations to Commission (Salsman, Morris, Hurley, and Bradford). The Technical Committee also:
 - Reviews reports and other documents provided to the Commission on a regular basis
 - Conducts inquiries into possible violations of rules
 - Suggests changes to petition application to provide clarification as needed

Other Supporting Documents

The Conditional Approval Policy

Small quantity generator (SQG) designation

Technical Position Paper on Assigning Generator

TLLRWDC Technical Position Statement: “Establishing the Generator of Low-Level Radioactive Waste For the Purpose of Determining Party vs. Non-Party Status For the Texas Low- Level Radioactive Waste Disposal Compact”

- This document provides guidance to the Commission if there is a question as to who is the generator of the LLRW
- It is based on the concept used by the Texas Commission on Environmental Quality in its shipping document TCEQ Form 20225 to determine “original generator” as being the last person to put the material to practical use
- The document is not a rule, and is only one consideration among many when making the generator determination



<http://www.tllrwdcc.org/>

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