

**Recommendation on Storage of Low-Level Radioactive Waste
Passed by the TRAB , April 15, 2000**

Subject: Length of Time for LLRW Storage

The Bureau of Radiation Control (BRC) has asked the Texas Radiation Advisory Board (TRAB) for guidance on the length of time a license should be granted for the storage of Low Level Radioactive Waste (LLRW), and this task was assigned to the Waste and Industrial Committee. The length of time a license should be granted is a complicated issue since any answer to this question involves policy as well as technical issues. This document contains the key issues and action items the TRAB recommends and is sending to Mr. Richard Ratliff, Chief of BRC. A major dilemma for the State of Texas is whether or not the LLRW site in Barnwell, SC remains available. Most available information indicates that the time Barnwell remains open to LLRW from Texas or its compact states is limited.

Background

The permanent disposal of Low Level Radioactive Wastes (LLRW) is complicated, and a permanent nationwide solution does not exist. These LLRW issues have remained unsolved even though the U.S. Congress took action in 1982 to establish a process whereby each state would address the LLRW to be permanently disposed from their state. The following list describes the main points the TRAB believes should be followed as the State of Texas moves forward to solve the LLRW issues for its citizens.

1. The State of Texas needs a solution to the LLRW disposal question.
2. The State of Texas should take title to the LLRW and should hold the license for the LLRW facility.
3. The LLRW facility should be operated by a private company. Financial assurance should be provided so that the State of Texas and the original generators will not have any future financial liability.
4. The LLRW facility should be located in an area which meets current siting requirements.
5. The State of Texas should pursue Assured Isolation (AI) as one of the options for addressing the needs of the State of Texas and for the Texas, Maine, and Vermont LLRW compact.
6. There should be only one LLRW storage/disposal site for the State of Texas, not multiple sites.

7. The State of Texas should consider a site where the local public is supportive and should be proactive in providing the local public with factual information so the local population can make an informed decision.

Specific Action/Recommendation for BRC regarding the length of time low-level radioactive waste may be stored/processed prior to disposal.

While the TRAB feels strongly that AI should be pursued as an option for the State of Texas, we do not believe the Texas Legislature envisioned BRC to grant a storage license for several hundred years. Therefore, TRAB recommends that BRC use a term of 160 years for the design life of the facility with the appropriate specifications for continuing compliance inspections and license renewals. TRAB anticipates the upcoming legislature will address the following questions and suggest that BRC carefully consider the outstanding legal and policy questions:

1. Does AI satisfy the requirement of the Texas, Maine, and Vermont compact?
2. Will a LLRW license (either AI or permanent disposal) be held by the State of Texas or by a private company?
3. Will the BRC or the TNRCC license the LLRW facility (either AI or permanent disposal)?

