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Sent: Monday, November 21, 2011 3:17 PM
To: Sonny Goldston; tmonday@perma-fix.com; 'Renee Echols'
Cc: Ginger Humphries; Geisinger, Robert (CONTR)
Subject: RE: EFCOG WMG Library

Included below are the brief descriptions and point-of-contact for the documents that I previously submitted.
Syd

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TRU Compliance – DOE/NV--1121

Determining Transuranic Alpha Activity Concentration for Compliance with the Nevada Test Site Waste Acceptance Criteria
Revision 0
May 10, 2006

The purpose of this position paper is to provide clarification on determining the transuranic (TRU) alpha concentration of low-level radioactive waste (LLW) for compliance with Section 3.1.1, Transuranics, of the NNSS Acceptance Criteria (NTSWAC), Rev. 6, and to ensure correlation with DOE/WIPP-02-3122, “Contact-Handled Transuranic Waste Acceptance Criteria for the Waste Isolation Pilot Plant” (CHWAC), Revision 4, effective December 29, 2005. Basically, this paper provides the justification that NNSS will accept as LLW those DOE wastes that fail to meet the TRU activity standard of > 100 nCi/g for acceptance at the WIPP.

Point-of-contact: R. Gregg Geisinger, RWAP Project Manager, NSTec, geisingrg@nv.doe.gov

Sealed sources – **Position Paper on the Proper Characterization and Disposal of Sealed Radioactive Sources**
Revision 2
October 1997

This paper, prepared by the Sealed Source Waste Characterization Subgroup, provides resolution of issues concerning the NNSS disposal of sealed radioactive sources. Included in this document are a definition of what constitutes a “sealed radioactive source” and guidance on classification of specific radionuclides as AEA 11(e)(2) byproduct materials or naturally-occurring/accelerator-produced material; a consistent approach for calculating sealed source radionuclide concentrations; development of sealed source characterization data; packaging requirements; beneficial use of lead shielding; consideration of radioactive decay products; use of adhesives and binders; characterization of undocumented sources; and adoption of NRC BTP with regard to encapsulation.

Point-of-contact: R. Gregg Geisinger, RWAP Project Manager, NSTec, geisingr@nv.doe.gov

MLLW Void Space – **Regulatory Position Regarding Void Space**
Letter from Nevada Division of Environmental Protection to NNSA/NSO dated August 2, 2006

This communication from the Nevada Division of Environmental Protection (NDEP), Bureau of Federal Facilities, provides guidance on the allowable void space in mixed low level radioactive waste containers sent to the NNSS for disposal. NDEP reviewed the regulatory background related to the RCRA void space requirement in the NNSSWAC, information provided by the National Nuclear Security Administration Nevada Site Office, and consulted with EPA Region IX. NDEP concluded that, when several specific conditions have been met, the 10% void space requirement may be waived. These conditions include the waste generator making every effort to completely fill the container, ensuring the strength of the container meets the strength requirement identified in the NTSWAC and that documentation, including photographs, be made available for NDEP review and concurrence.

Point-of-contact: R. Gregg Geisinger, RWAP Project Manager, NSTec, geisingr@nv.doe.gov

Lead shielding – **DOE/NV-1120**
Position Paper on the Use of Lead Shielding for the Disposal of Low Level Waste at the Nevada Test Site
Revision 2
June 2, 2005

This paper provides the justification for NNSS acceptance of lead in LLW packages where the lead provides intrinsic shielding for package contents. The justification for the use of lead shielding was based on EPA's position on the use of lead-lined containers, as documented in OSWER Directive 9432.00-23. The subject guidance addresses the determination that lead container liners that are primarily used for shielding wastes being disposed are not considered as hazardous waste under RCRA. The position paper also establishes that bulk lead introduced into LLW packages which is necessary for radiation protection during disposal operations is also not considered a hazardous waste under RCRA - as long as the lead was not radioactively contaminated when introduced.

Point-of-contact: R. Gregg Geisinger, RWAP Project Manager, NSTec, geisingr@nv.doe.gov

High moisture content – **Position Paper for High Moisture Content Waste**
Revision 0
November 3, 1998

This position paper provides a uniform approach for NNSS waste generators to comply with the NNSSWAC free liquid limitations when profiling wastes with high moisture content – including development of more consistent waste characterization packages. The guidance provided includes that for determining if wastes are innately dry based upon process knowledge or adequate testing; if moisture is sufficiently bound in the waste form; selection of appropriate

sorbents and packaging; and evaluation of elapsed time from packaging to shipment and storage temperatures.

Point-of-contact: R. Gregg Geisinger, RWAP Program Manager, NSTec, geisingr@nv.doe.gov