

MIDWEST UTILITY PERSPECTIVE ON COMPACTS

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ABSTRACT

Progress has been made in the regional LLW compact process. However, new LLW disposal sites are not firmly within reach. The process needs additional momentum. Waste generators can help supply information for site development plans, waste volume management and clarification of shallow land burial technology.

INTRODUCTION

An assigned title as general as "A Midwest Utility Perspective on Compacts" invites consideration of a subtitle. Further, if I used the definition of perspective that means to view things in their relative importance, my subtitle might be as specific as "Will the waste generators in the Midwest Region have access to Low Level Radioactive Waste disposal facilities when they need it?" However, I will take a somewhat broader view and direct my remarks to the broader process now in progress to provide new regional disposal sites. The choice to do that is because the process is no longer just intra-regional in nature.

Progress Since The 1980 Act

The 1980 Low Level Radioactive Waste Policy Act (LLRWPA) in essence called for a geographical redistribution of disposal facilities. This directive certainly challenged the institutional processes that are available to carry out such development. But considerable progress has been made since the passage of the 1980 law. Compacts have been drafted, approved by state legislatures, and regional commissions have been constituted and are routinely conducting business. Congress has before it four Compacts. There is talk between regions.

I believe it is important that from Congress to local constituencies, the message people need to know is that significant progress has been made.

However, new disposal sites are not firmly within reach. That threatens the situation. It calls for some additional momentum to be added to the process and I would like to focus some suggestions for adding that momentum.

Who Can Help

The 1980 federal law gave the States definitive responsibility for providing for disposal of radioactive waste from within their borders. No such definitive charge responsibility was given to the States on the broader waste management issue. And with the opportunity afforded by that interpretation, I think it would be appropriate for ultimate users of disposal facilities to step up their participation

in the process and help pick up the momentum now underway.

Opportunities

There are three subject areas where I believe immediate and aggressive activity is needed in those regions without sites.

1. Assemble definitive plans for development of new regional LLRW disposal facilities. This should include an activity sequence, activity start and completion dates, and identification of the organization responsible for conducting the activity.

2. Explore waste management from a volume perspective.

Identify options for minimizing waste generation at the source.

Continue efforts to seek regulatory agency declarations of wastes that qualify for de minimis status or below regulatory concern.

Evaluate the economic impact of total disruption of access to disposal facilities.

3. Clarify the technology of shallow land burial of LLW.

If the users of disposal facilities are quick to respond or assist in providing input in these areas, it will help pick up the momentum of the process and contribute to an orderly transfer to a regional system of disposal operations. I will explain further what I think these actions involve.

DETAIL ON OPPORTUNITY TARGETS

Disposal Facility Development Plans

Definitive plans for development of new regional disposal facilities must be prepared. Regions needing such facilities must be able to communicate with many sectors as to how and when they expect to have new disposal facilities. It simply isn't enough to say we're working on it. It must be reduced to a living and working set of documents.

An activity sequence linking and intertying all the activities that must be done can be prepared. The activities don't need to be site specific, but it must include the public participation aspects as well as the site selection development and operation considerations. A duration or time for completion can be associated with each activity. Major milestones can be date targeted. A real advantage of this kind of planning is the ability of fixing a target date and if necessary later revising the activity sequence to allow the target date to be met. That is how project management skills are put to the test. Simply slipping the target date to a later time need not be the answer.

Assigning the responsibility to an organization for working on the identified activities is also an essential ingredient. Radioactive material user groups as well as state government could be assigned responsibility for certain activities. In many cases, users of LLW disposal facilities have the expertise and can supply resources and gather input to prepare the preliminary plans to which state government and regional commissions can initially react and then finalize. A coordinated effort by all the parties involved can produce a timely and effective program. The development of new disposal facilities is less a regulatory effort and more of an implementation effort and requires a cooperative government-industry-public relationship than a traditional regulator-regulate arms length relationship.

LLW Volume Considerations

Total volume, volume reduction, deminimis volume and cost per unit volume are attributes of the LLW stream that will get a lot of attention in the near future. It is a topic of discussion that needs detailed data now.

First, a few words about one volume reduction aspect for which waste generators can provide information in the near term. There are opportunities for management of waste volume at the source of generation. In certain operations material finds its way into the waste stream because it is convenient to put it there, not necessarily because it needs to be there. It may take verification or sorting to remove it from the waste stream, but such selection has the promise of low cost volume reduction.

Second, waste generators need to aggressively look at completing regulatory action to allow it to be classified at deminimis or below regulatory concern. There are a number of waste commodities with very low levels of radioactivity that, with regulatory review, could be disposed at other than LLW facilities. The Low Level Waste Section of the Utility Nuclear Waste Management Group that I chair has recently completed a study on lubricating oil with very low levels of radioactivity and substantiated that disposal by modes other than shallow land burial are within regulatory guidelines. Similar studies can also be conducted for other waste commodities. Regulatory action on these items will help shrink the waste stream if generators and state and federal governments actively pursue this reclassification.

Third, we need to look at the economics of a full disruption in access to disposal facilities. Not that it is going or even likely to happen except in an emergency. But information is needed in Congress and on down to develop some understanding

or rationale for not allowing it to arbitrarily happen. This information could demonstrate why it is worth moving ahead expeditiously toward developing new disposal sites.

Technology of Shallow Land Burial

Shallow land burial technology must be supported. It is a disposal technology that has been used successfully. Regulations are in place to support it, and there is a considerable amount of experience to support it. If the performance aspects of the technology are more clearly explained, then a consensus can be developed for situations where applications of that technology are appropriate. This task is one well suited for users of disposal facilities, particularly utilities. The Electric Power Research Institute has developed handbook type information for siting LLW disposal facilities. An extension of this information to better explain SLB performance has been started.

SUMMARY

In summary, the process of developing new LLW disposal facilities in response to the 1980 LLRWPA needs to pick up momentum. Part of the momentum can be gained by the expeditious preparation of information in three areas:

- planning schedules for development of new disposal facilities;

- review of waste volume characteristics and opportunities for reductions and associated costs;

- development of clarifying information on shallow land burial technology.

Many of the organizations that use LLW disposal facilities can help supply these information needs. That information can be used to carry forward the many tasks that regional commissions or delegations need to complete.