

Compact Waste Facility Disposal Capacity Supplemental Report

Purpose

The purpose of this report is to document the updated capacity needs for the Compact waste disposal facility (CWF). The CWF is currently licensed for 2.3 million cubic feet and 3.89 million curies for a 15 year license term. These licensed volumes and radioactive source term have been thoroughly reviewed and are protective of human health and the environment. The results of our analysis indicate more than adequate capacity for operational low-level radioactive waste (LLRW), reserve capacity for decommissioning LLRW, and excess capacity of approximately 1.1 million cubic feet and 1.5 million curies with full decommissioning reserve.

Background Information

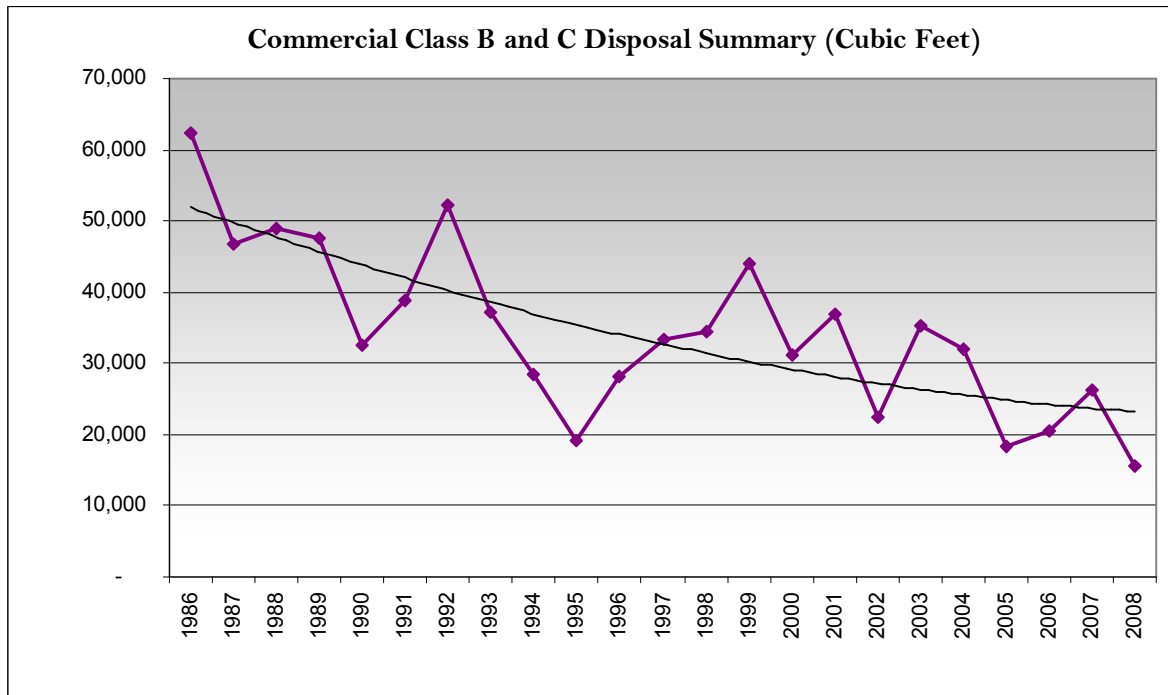
The Texas Commission on Environmental Quality (TCEQ) issued the CWF license. As a part of the pre-licensing and licensing activity, the Texas Natural Resource Conservation Commission (a predecessor agency to TCEQ) generated a report - *Texas Compact Low-Level Radioactive Waste Generation Trends and Management Alternatives Study, 2000, Rogers & Associates Engineering Branch URS Corporation* (2000 Study). The 2000 Study provided the necessary foundation for licensing, design, operations, and need for the compact generators in Texas and Vermont. The report was completed in 2000 and relied on LLRW volume and radioactivity estimates from compact generators, as well as previous studies conducted in the late 1980s and early 1990s. Where survey data were not provided for later reports, the estimates of volume and radioactivity were derived from the earlier studies.

It is critical and appropriate to update the disposal capacity expected to be needed by Compact generators given that 10 years have passed since the last 2000 Study and up to 25 years have passed since some of the estimates (upon which later estimates were based) were developed. A disposal capacity update is particularly necessary and timely given the dramatic reductions in the nuclear industry LLRW generation rates, the present requirement of the Texas Low-Level Radioactive Waste Disposal Compact Commission (Texas Compact Commission) to develop current waste volume estimates, and the planned opening of the CWF in late 2011.

Figure 1 below depicts the Department of Energy's data on disposal volumes of Class B and C waste over the last 25 years, and illustrates the dramatic reductions in waste volumes. Disposal volumes have been reduced by approximately 77% since 1986 and by more than 50% since the 2000 Study waste volume estimates were completed.

These reductions in waste generation volumes are primarily the result of operational enhancements and better practices at the LLRW generating facilities. Additionally, many advances in waste volume reduction, characterization, and sorting and segregating activities are being effectively employed to reduce disposal volumes.

Figure 1 Commercial Class B and C Disposal Volume



Source: U.S.DOE MIMS database

License Application Volume and Radioactivity

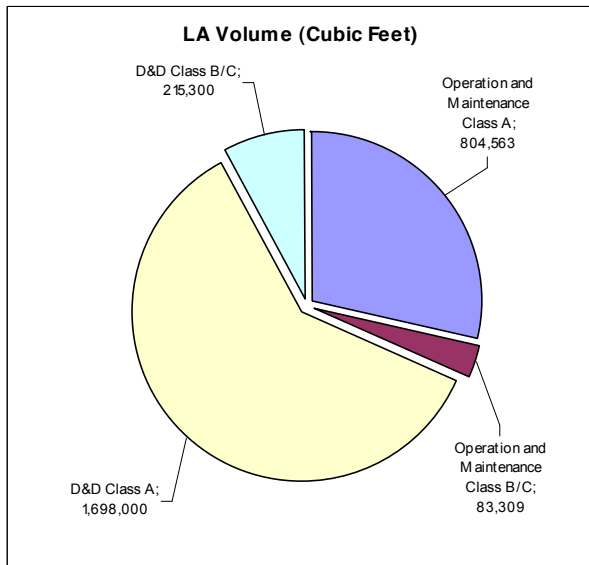
The 2000 Study stated that Rogers and Associates Engineering (RAE) “*projected the LLRW volume that would require management over the next 35 years to be about 2.7 million cubic feet. Of this, only about 660,000 cubic feet is operational LLRW, the balance resulting from nuclear power plant decommissioning activities. Nuclear electric utilities of the Texas Compact generate about 70 percent of all operational LLRW volume, with academic generators adding another 14 percent of the volume. Nuclear electric utilities of the Texas Compact generate over 95 percent of the total radioactive inventory generated.*”

(Note: WCS uses the performance assessment volume rounded to 2.8 million cubic feet)

When the WCS application for a LLRW waste disposal license was prepared in 2003, the waste volume estimates in the 2000 Study were used as a baseline to develop the waste volume estimates in the license application (LA). Ultimately, the amount of LLRW included in the LA was 2.8 million cubic feet. At the time, this was the best available estimate. Since then, WCS has refined the LLRW volume estimates, and its review indicates that the volumes in the 2000 study overestimated the required Compact volumes.

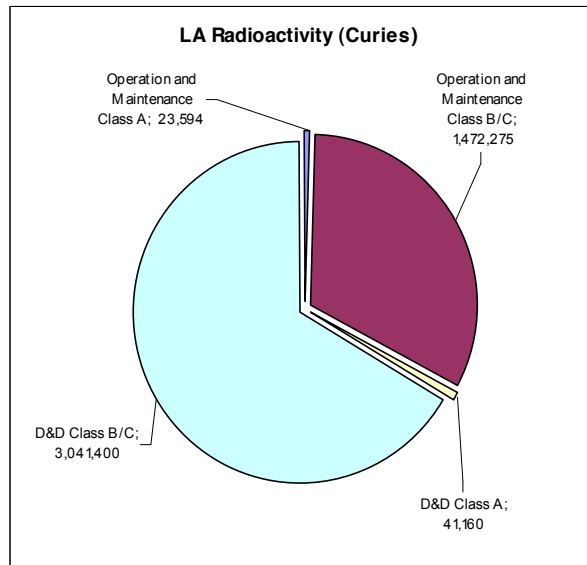
Using the waste volume data from the 2000 study, Figures 2 and 3 depict the contributions to volume and radioactivity by the class of waste and the waste generating activity from the WCS LA, which was based on the RAE 2000 Study. Clearly, the decontamination and decommissioning (D&D) of the five Compact reactors is the most significant contributor to the volume and curie capacity needs.

Figure 2 LA Volume



Source: LA Vol. 2 App. 8 Table 8.2-3

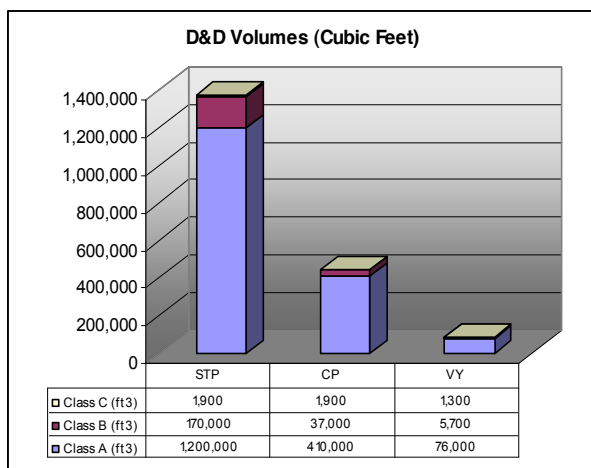
Figure 3 LA Radioactivity



Source: LA Vol. 2 App. 8 Table 8.2-5

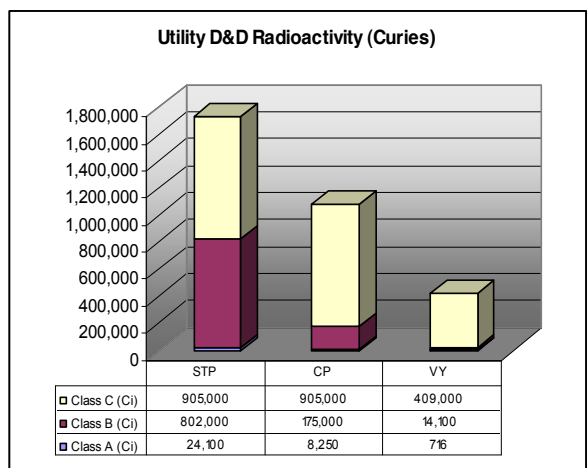
Figures 4 and 5 depict the contribution to volume and radioactivity from decommissioning from the South Texas Plant (STP), Comanche Peak (CP), and Vermont Yankee (VY) by class of waste. As stated previously, the 2000 Study relied on information available at the time. Based on updated information from the utility reports to the Texas Compact Commission, the current LLRW disposal needs related to decommissioning the facilities has been significantly reduced. Both Comanche Peak and South Texas are two unit Pressurized Water Reactors of similar size and Vermont Yankee is a single unit Boiling Water Reactor.

Figure 4 LA D&D Volume by Utility



Source: LA Vol. 2 App. 8 Table 8.2-3

Figure 5 LA D&D Radioactivity by Utility



Source: LA Vol. 2 App. 8 Table 8.2-5

More up-to-date information is available from recent operational history (2000 to 2010), updated reporting requirements associated with the D&D of nuclear facilities, and the associated NRC review of decommissioning funds.

The needs associated with other small compact generators, such as medical facilities, laboratories and manufacturing facilities also require updating; however, the proportion and effect of these updates have a much lower effect on the capacity needs assessment.

Updated Projections

Waste Control Specialists has revisited the Texas Compact generator waste volume and radioactivity projections. Our updated analysis indicates that the volumes and activities estimated in the 2000 study are overestimated based on the current state of the art in radioactive waste management.

The updated information is the result of evaluating several sources that maintain more current LLRW disposal information. The most significant sources of new information are the more robust information provided directly from the Texas Compact utility generators, analysis of data maintained by the U.S. Department of Energy Manifest Information Management System (MIMS) database, and updated decommissioning reports from the Texas Compact utilities that was also provided to the NRC.

Key Assumptions for the Analysis Update

Several key assumptions and processes apply in the conduct of this analysis update. They are:

1. Utility operations and maintenance waste types and volumes are revised based upon updates from the three Texas Compact utilities. Consistent with the LA, disposal volumes are used as the most appropriate measure of disposal capacity needed.
2. All five reactors are assumed to be operational until 2030 at which time they all shutdown and begin prompt decommissioning over the next 15 years.
3. This analysis update represents the most conservative case for both volume and radioactivity.
4. Decommissioning projections:
 - a. Vermont Yankee (VY), South Texas Plant (STP) and Comanche Peak (CP) projected volumes are based on 2009 information provided by the utilities to the Texas Compact Commission. VY volumes have significantly increased over the 2000 Study. STP volumes are significantly reduced, and along with CP volumes are consistent with the guidance in the NRC Standard Review Plan for Decommissioning Cost Estimates for Nuclear Power Reactors (NUREG-1713). Significant advances have been made with the completion of decommissioning of the first reactors during the last ten years. This actual decommissioning experience has been incorporated in the NRC guidance, representing a much more realistic and consistent expectation versus the 2000 Study.
 - b. These updates result in higher waste volumes from VY, slightly reduced volumes from CP, and significantly reduced volumes from STP decommissioning as compared to the LA.
5. Volumes and activity attributed to non-utility generators have not been changed in this updated projection as the original information appears consistent with historical data and no detailed updates are available.

6. Two significant changes drive the updates to the radioactive source term (curies) requirements of the Texas Compact generators:
 - a. Approximately 2,500 cubic feet waste was projected by the LA in the first 3 years of CWF operations with a corresponding 1.3 million curies. These waste volumes are replaced with current estimates from VY which are significantly reduced.
 - b. Almost 2,000,000 cubic feet and associated curies were projected in the LA from decommissioning. The utilities updated estimate reduced the volume by more than a factor of two with corresponding reductions in curies.

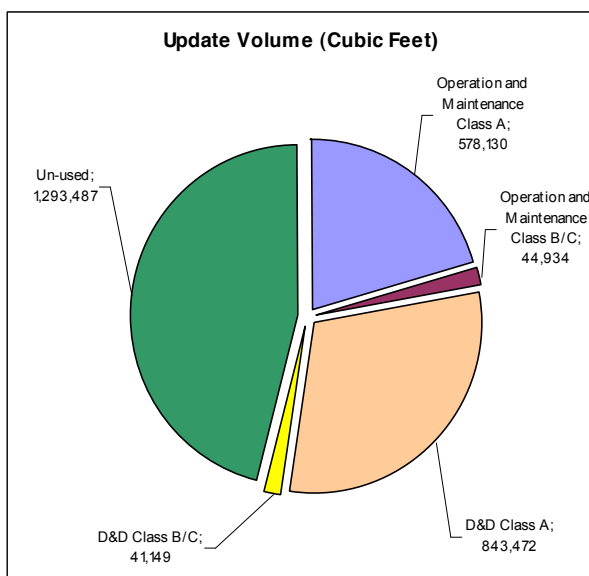
Variance from 2000 Study

The total updated projected need for the analyzed 35-year life of the CWF from Texas Compact Generators is updated to an estimated 1.5 M cubic feet and 2.5 M curies under the most conservative assumptions. This is compared to the original estimated 35-year capacity of 2.8 M cubic feet and 4.6 M curies as analyzed in the LA. Data comparison for the LA and the 2010 update are presented in Attachments 1 and 2.

For the 15-year license term, the updated need for Texas Compact generators is 1.2 M cubic feet and 2.4 M curies with full decommissioning reserve. When compared to the existing license (2.3 M cubic feet and 3.9M curies), this results in about 1.1 M cubic feet and 1.5 M curies of unused capacity in the current license, allowing for full decommissioning reserve.

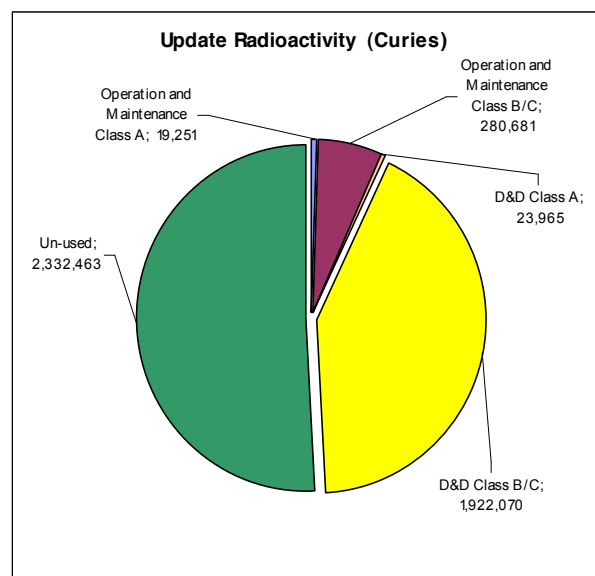
Figures 6 and 7 depict the required and unused volume and radioactivity by the class of waste and the generating activity based on the originally estimated 35 year capacity of 2.8 M cubic feet and 4.6 M curies.

Figure 6 Update Volume



Source: Compact Generator Analysis Update, 2009 TCC Reports

Figure 7 Update Radioactivity



Source: DOE MIMS for Operational Waste, LA for D&D Waste

Risk and Contingency

Potential risk factors were identified that could result in variances with the updated projected volumes and radioactivity. The assumptions used in the disposal capacity update describe the current licensed operating life of STP and CP and assume that VY will operate an additional 20 years. The update also assumes decommissioning of all five currently operating Texas Compact reactors within the 35-year life of the CWF. This is the most conservative case that can be put forward to describe capacity needs during a 35-year life, which is the same life assumed by WCS in its license application. Additional operating and decommissioning volumes and curies from newly constructed reactors is not included because waste streams generated from new reactors were not considered at the time of the application, and decommissioning of the new units will happen well beyond the WCS license application term.

Several potential changes could effect the updated projections, resulting in positive variances of more volume and curies available for disposal. The possible changes are summarized below:

1. Continued nuclear industry trend of lower waste generation rates for both operational and decommissioning LLRW. All evidence supports the notion that small and large generators will continue to implement methods and technologies to reduce the amount of waste generated. **The effect would be increased capacity.**
2. License amendment or renewal requests. License amendments or renewals could allow more efficient disposal methods, expand physical capacity and allow additional radioactivity. **The net effect would be significant increased capacity.**
3. Use of actual data collected from active operations to perform modeling and analysis required by regulations. The actual volume and curies disposed will be tracked and used to continually update the models used to demonstrate protectiveness of the CWF to health, the environment, and the public. It is anticipated that the actual data will be more favorable than the assumptions in the LA due to the conservatism used to demonstrate protectiveness during the LA process. **The effect would be increased capacity.**
4. Decommissioning of the reactors is delayed as currently projected by each of the utilities. Two effects are probable. First, delay will allow decay of short lived isotopes and use less of the radioactive source term (curie limit) making additional curies available. Second, delay may extend the actual decommissioning past the 35 year life of the CWF. **The net effect would be increased capacity.**

Attachment 1

**License Application and 2010 Update
Volumes**

Attachment 2

License Application and 2010 Update Radioactivity Detail

