



February 22, 2024

Stephen Raines
Executive Director
Texas Low-Level Radioactive Waste Disposal Compact Commission
919 Congress Ave., Suite 830
Austin, TX 78701

Re: Comment on Proposed Changes to 31 Texas Admin. Code 675.24

Dear Mr. Raines,

Bionomics will likely not be affected by the current proposed changes in 675.24(d)(1-5), however the impact of any change, no matter how small, that affects the Broker and Processor Industry is always a concern to us. Putting ourselves in the theoretical situation of an affected facility, we reviewed our present reporting requirements and costs to determine the consequences.

While we have nowhere near the volume of shipments and information that WCS handles, we do handle more material than most companies shipping into the Compact. The Commission may see the proof of this by the number of Condition Removal Letters (CRL) associated with those shipments, which is a fraction of the total number of shipments we make each year with other licensed facilities.

Reporting Requirements

Bionomics maintains an onsite inventory system documenting every radioactive material or waste shipment that we handle, including the particulars on each container and ultimately the final destination, and/or processing/disposal location. From this database we can prepare reports, manifests, disposal certificates, and respond to any regulatory requirements regarding what we have received and where it was dispositioned.

This is the normal business practice for our industry. For each shipment we send to a facility for processing or disposal as waste, we prepare an NRC Form 540, 541 and 542. The 542 documents each generator and the information regarding the materials from that generator. Apart from our own internal database, this information is collected in a commercially available database that is used to create electronic documents to send to WCS, Energy Solutions and other processing and burial facilities.

In Tennessee, we make two separate reports on an Excel database to our state regulator, one monthly and one quarterly. Within these reports we provide, generator and their State or Territory, along with incoming and outgoing weight, volume, and activity.

Every year, we assist generators in submitting reports to various Compacts and States detailing the waste or material we handle for them and the disposition of the material. Three States in particular that require such reports are New York, Ohio, and Illinois. At all times, we provide our clients with all chain of custody documents and disposal certificates detailing where their LLRW was sent for disposal.

For regulatory compliance purposes we have a weekly report documenting any material consigned to our facility in detail and upon disposal, document on the same spreadsheet the shipments out including destination and date of completion.

Summary

In all, using preexisting databases we spend approximately 168 hours per year at a cost of less than \$12,000.00. We consider this figure to be part of the cost of doing business in this field. Using these databases, we determined the cost to formulate a report required in 675.24 (d)(1-5), would be anywhere from \$840.00 to \$1,680.00 per year which is equivalent to the cost of preparing Reports to our Tennessee regulators.

Since we already track and document materials and waste we handle, the impact on extra reporting outlined in 672.24, if we would be required to comply, appears to be minimal and not onerous. If you have any questions or wish to discuss our comments, please contact me at 865-220-8501.

Sincerely,

A handwritten signature in black ink, appearing to read "John McCormick", written in a cursive style.

John McCormick