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July 27, 2017

ATTN: Leigh Ing - Executive Director
Texas Low-Level Radioactive Waste Disposal Compact Commission
505 West 15th St.
Austin, TX 78701
administration@tllrwdcc.org

RE: Comments on Export Applications:
TLLRWDC #3-0019-0
TLLRWDC #3-0020-0
TLLRWDC #3-0021-0
TLLRWDC #3-0022-0

Dear Commissioners of the Texas Low-Level Radioactive Waste Disposal Compact Commission:

Per 31 TAC 675.21(f), Nuclear Sources & Services, Inc. is submitting commentary to the commission in an effort to solicit clarity on the rules and their application to the referenced export applications.

NSSI does not agree with the waste description listed under section IV of the Export Application wherein the petitioner has listed reasons why it is more feasible to export the waste. Specifically, NSSI has taken issue with the statement that it is more economically feasible to export party state waste for "processing and burning." Thermal treatment of this waste is only but one treatment option available. Facilities such as ours are permitted for numerous treatments that can be economically competitive due to our close proximity to the generators. Additionally NSSI fully understands that generators do not want to take on the risks associated with consolidating their waste, nor do they have the means to properly prepare waste per the acceptance criteria set forth by the compact facility operator. NSSI can provide these services along with logistics between the generators, NSSI, and the compact facility.

Our goal is to bring to light to the committee that there are other facilities in Texas that can process and treat party state waste within the compact. It behooves the Texas Low-Level Radioactive Waste Disposal Compact Commission to make every effort to keep party state waste within the compact to avoid an economic impact on the host county, the host state, and the compact facility operator in accordance with 31 TAC 675.21(g)(4). It is NSSI's position that exporting party state waste is not within the full cooperation or best interest of Texas and the compact. Every option available to maintain the waste in Texas has not thoroughly been explored.

If you have any questions or need any additional information, please contact me at 713-641-0391 or via email at gtorres@nssihouston.com. Thank you for taking the time to read our comments.

Regards,

A handwritten signature in black ink, appearing to read "Leigh Ing", is written over a white background.



Shipping Address: 5711 Etheridge Street, Houston, Texas 77087
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Gamaliel Torres
Radiation Safety Officer

GT/vla
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