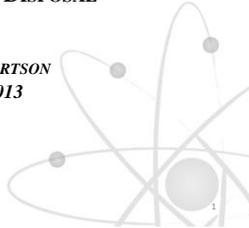




### IMPACTS OF REVISED CONCENTRATION AVERAGING AND ENCAPSULATION BRANCH TECHNICAL POSITION ON SEALED SOURCE DISPOSAL

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### Draft Revised Concentration Averaging BTP and Sealed Sources



- The "Branch Technical Position on Concentration Averaging and Encapsulation" (CA BTP) is the NRC's primary guidance for LLRW disposal limits that ensure protection in the future of an inadvertent intruder
- Revision of the CA BTP has the potential to significantly increase the number of dangerous sealed sources commercially disposed
- The draft revised CA BTP (May 2012) utilizes a revised intruder scenario for sealed sources, which results in:
  - Increased Cs-137 sealed source limit, from 30 Ci to 130 Ci
  - Increased Class B Co-60 limit, from 700 Ci to no limit
- The draft also includes important guidance on 'alternative approaches' to facilitate disposal of higher activity sources within the current Part 61 class limits
- The draft explicitly recognizes the national security benefits of the increased sealed source disposal limits

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### Draft Revised CA BTP and GTRI/OSRP



- The DOE/NNSA Global Threat Reduction Initiative Offsite Source Recovery Project (GTRI/OSRP) facilitates sealed source recovery in the interest of national security, public health, and safety
- GTRI/OSRP encourages disused sealed source generators to register their sources at [osrp.lanl.gov](http://osrp.lanl.gov) for possible recovery support (directly or via CRCPD's Source Collection and Threat Reduction Project – SCATR)
- Currently registered Cs-137 sealed sources:
  - 16 sources from 30Ci – 130Ci (generic limits, current and draft revised)
  - 222 sources from 130Ci – to 960Ci Class C limit (potential for alternative approaches)

*Note: GTRI/OSRP voluntarily-registered, sealed sources represent only a portion of the total disused source population and does not include the many such sources currently in use*

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Revised CA BTP –



Alternative Approaches for Sealed Source Disposal

- **The draft revised CA BTP 'alternative approaches' are significant**
  - The new 'alternative approaches' would allow for higher activity sealed sources to be disposed based on site-specific characteristics
  - These approaches would not require approval under 10 CFR 61.58, which is the only option referenced in the 1995 CA BTP (and has only been used once)
  - Subject to state regulator approval; no NRC involvement is required
- **Implementation of the revised CA BTP will be a significant change and will take time and resources**
  - The ongoing Part 61 rulemaking on site-specific performance assessments may result in delayed implementation of the alternative approaches
  - The potential for higher activity sealed source disposal may also require time and resources to clarify issues pertaining to waste preparation and packaging
  - Sites may look to NRC for support with stakeholders and technical issues

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