

WCS **Challenges to LLW Disposal**

- State and local government support
- Regulations have not kept pace with changes
- Cooperation between generator and disposal facility for how to best package waste for disposal

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WCS **WCS Services**

WCS provides the most comprehensive, full service, and complete Radioactive and Hazardous Waste Services in the Nation.

Disposal

- Low-level radioactive waste (LLW)/Mixed LLRW (MLLW)
- RCRA/TSCA Regulated Waste (Hazardous waste)
- Texas Exempt Waste
- Byproduct Material

Storage

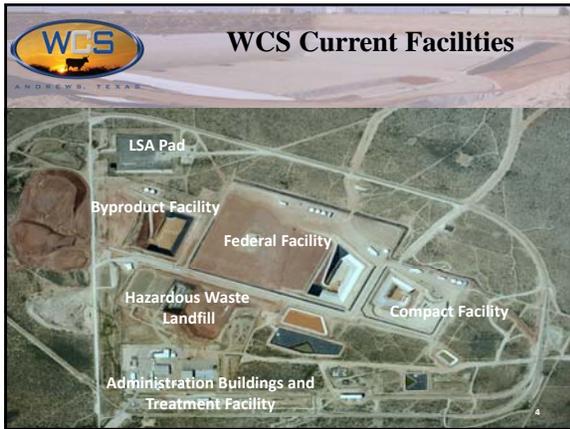
- Radioactive Waste, including GTCC LLW and Transuranic Waste
- RCRA/TSCA Waste

Treatment/Processing (including dewatering and void filling)

- Mixed LLRW (MLLW)
- RCRA/TSCA Waste

- Exemption to treat and store Special Nuclear Material (SNM) below certain concentration limits based on criticality – U.S. NRC in November 2001

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WCS
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Consent Based Approach

- Andrews County recruited WCS to site a low-level waste disposal facility in their county
 - Diversification of the local economy
- State of Texas is business friendly and generally allows counties freedom to govern
- Twenty year relationship with the local county and state as legislation was enabled and a license was issued
- Sounds easy, but consent is very difficult

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WCS
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Location, Location, Location

- WCS Andrews facility first purposefully sited LLW disposal facility
- All other disposal facilities resulted from Cleanup and Remedial efforts
- Natural conditions provide safe and protective disposal and assured long-term performance
 - Red bed clay
 - Arid environment
 - No water sources
 - Exhaustive site characterization

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Regulations Have Not Kept Pace

- WCS was first LLW landfill in 30 years and first licensed under the LLW Policy Act
- Disposal is 30 feet to 120 feet deep with seven-foot thick liner systems
- Allows for disposal of LLW that didn't have solutions previously
 - Depleted uranium
 - Greater than Class C
- NRC regulations still pending for DU and GTCC

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Cooperation is Beneficial

- WCS prefers to work with generators up front
 - Size waste so it fits in disposal facility, but doesn't require too much pre-disposal work
 - Transportation packaging for ease of handling at both ends
 - Characterize waste to save money on disposal; different options for different waste
- Cookie cutters are for cookies, not low-level waste

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US Approach Can Improve

- WCS has four landfills to dispose of waste
 - All share common, protective natural characteristics
 - Differences in Engineered systems
- Uranium can be disposed of in all four landfills
 - Which depends on the process that created the waste
 - Each governed by a different set of regulations
- Why do we need four landfills to dispose of the same isotope of Uranium?
- A risk-informed, performance-based approach to evaluate waste for disposal would be beneficial

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Questions?

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