



CONFERENCE OF RADIATION CONTROL PROGRAM DIRECTORS, INC.

1986 RESOLUTION

Relating to: Disposal of NARM Waste

- WHEREAS:** The Conference of Radiation Control Program Directors, Inc., has a sustained strong interest in insuring that Naturally Occurring and Accelerator Produced Radioactive Material (NARM) is safely managed and is disposed of properly.
- WHEREAS:** Public Law 99-240 enacted January 15, 1986 amended the Low-Level Waste Policy Act of 1980 to assign responsibility for disposal of various classes of radioactive waste to the States and to the Federal government.
- WHEREAS:** The responsibility for disposal of NARM waste was not mentioned in PL 99-240 because NARM is not defined in the Atomic Energy Act of 1954, as amended.
- WHEREAS:** NARM includes discrete sources of Radium which are of particular concern to State Radiation Control Programs because these sources have a long half life, are highly toxic, and currently cannot be disposed of at certain existing licensed disposal sites.
- WHEREAS:** A recent revision to the Suggested State Regulations, Part D, has incorporated a Class C upper limit of 100 nanocuries per gram for Radium.
- WHEREAS:** The U.S. Nuclear Regulatory Commission has developed a waste classification system for lowlevel radioactive waste in 10 CFR 61, however, this classification system does not include NARM.
- WHEREAS:** PL 99-240 assigns to the U.S. Department of Energy the responsibility for disposal of radioactive waste that exceeds the NRC limits for Class C waste.

NOW THEREFORE BE IT RESOLVED:

That the Conference take the following actions:

Request the U.S. Nuclear Regulatory Commission for technical assistance to develop a suggested Class C upper limit for NARM waste.

Request the U.S. Department of Energy to include in its report to Congress the concept that the U.S. Department of Energy will agree to accept for disposal NARM waste above the Class C limit developed above.

NOW THEREFORE BE IT FURTHER RESOLVED:

That each full member of the Conference contact the person in his/her state that is the state representative to the Regional Compact for Disposal of Low-Level Radioactive Waste and discuss with him/her the need for the safe disposal of NARM waste. He/she should explain to the regional compact representative that the disposal of discrete sources of NARM that are less than the Class C limit is a legitimate responsibility of the state and that such sources should be disposed of in the regional site.

Adopted: May 18, 1986
Original signed by Charles M. Hardin, Executive Secretary
Conference of Radiation Control Program Directors, Inc.