

THREE KEY POINTS

REGARDING THE

REINTERPRETATION OF HLW



This is a win-win-win for host communities, the environment and taxpayers

1

- It **reduces time** that radioactive waste is stored on-site at DOE facilities, **increasing safety** for workers, our community and the environment.
- It utilizes mature and available commercial facilities and capabilities to shorten mission completion schedules and **reduce taxpayer financial liability**.
- It allows removal of some radioactive waste from the states where it has been stored for decades and provides for the disposal of these wastes in facilities licensed, constructed and regulated for this purpose.
- By reducing costs and expediting cleanup activities, DOE can focus more quickly on other high-priority cleanup projects, ultimately **reducing risks** across the DOE weapons complex.

DOE is moving forward in a way that is respectful of state and local communities

2

- Implementation of the interpretation would be conducted on a **site-by-site basis**, and the Department will work closely with local officials, regulators and stakeholders where radioactive waste is stored and where such waste might be disposed, ensuring a role for their engagement before changing or revising current policies, legal requirements or agreements with respect to defense HLW. Decisions on implementation will be based on **evaluation and characterization of specific waste streams** in conjunction with waste acceptance criteria and requirements of a specific waste disposal facility; input from affected stakeholders and compliance with applicable federal and state laws, regulations and agreements.
- If DOE proposes an action to which NEPA would apply, DOE will analyze potential environmental impacts of such a proposal through the NEPA process that requires “meaningful” opportunities for public participation.
- In the meantime, DOE will continue its current practice of managing radioactive wastes as HLW.

This is not new or untested

3

- This interpretation **brings the US in line with international practices** (IAEA) and guidelines for the management and disposal of radioactive waste based on radiological risk as used by other countries managing nuclear waste.
- DOE and the commercial nuclear industry have decades of experience with the safe and effective disposal of low-level radioactive waste, which is already managed **according to its characteristics** – not by how it was generated.
- The scientific community, including leaders of our national laboratories and staff at the Nuclear Regulatory Commission, **agree with the technical basis** for managing waste based on radiological content.



CONSIDER THIS...

Think of your household trash and recycling.

With this notice DOE is saying it is going to be able to send disposable water bottles for recycling because they are made of plastic. Regardless of where the plastic bottle was purchased—Safeway or another grocery store—the bottles are the same and can be recycled.

It does not matter where it came from—a plastic bottle is a plastic bottle.

It is the same for radioactive waste. Under the HLW interpretation, DOE’s disposal decisions will be based on the **actual radiological characteristics** of the waste rather than where the waste came from.

This change removes artificial and unnecessary standards for disposal decisions without sacrificing public or environmental safety at DOE sites across the country.