

R/GMB/09 Jun 92



DEPARTMENT OF THE NAVY  
NAVY ENVIRONMENTAL HEALTH CENTER  
2510 WALMER AVENUE  
NORFOLK, VIRGINIA 23513-2617

6470  
Ser 31/ **3717**  
JUN 03 1992

From: Commanding Officer, Navy Environmental Health Center

Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Encl: (1) OPNAVNOTE 5100 Ser 455/2U601665 of 7 Apr 92  
(2) NAVENVIRHLTHCEN ltr 6470 Ser 31np/1552 of 30 Jan 92

1. Enclosure (1), which establishes policy for disposal of low level radioactive waste (LLRW), is forwarded for information and appropriate action. Enclosure (1) requires that actions be instituted by 1 September to arrange for disposal of all stored LLRW. Paragraph 6 of enclosure (1) defines LLRW for the purpose of this program.
2. Enclosure (2) states the requirements for requesting disposal of LLRW from the Naval Sea Systems Command Detachment, Radiological Affairs Support Office which is designated as the technical support center for execution of this program.
3. A copy of all requests for disposal of LLRW shall be sent to the Navy Environmental Health Center (NEHC-31).
4. The point of contact on this subject is LCDR G. I. Snyder, MSC, USN, Radiation Health Department (NEHC-31), DSN: 564-4657 or Commercial: (804) 444-4657, Ext. 413.

*G. I. Snyder*  
G. I. SNYDER  
By direction

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DEPARTMENT OF THE NAVY  
Office of the Chief of Naval Operations  
Washington, DC 20350-2000

Canc: Mar 93  
OPNAVNOTE 5100  
Ser 455/2U601665  
7 April 1992

OPNAV NOTICE 5100

From: Chief of Naval Operations  
To: All Ships and Stations  
Subj: LOW LEVEL RADIOACTIVE WASTE  
(LLRW) DISPOSAL PROGRAM

Ref: (a) OPNAVINST 6470.3  
(b) OPNAVINST 5100.8G  
(c) NAVSEAINST 5100.18A

1. **Purpose.** To establish policy for disposal of low level radioactive waste (LLRW).

2. **Scope.** This notice applies to all Department of the Navy (DON) activities engaged in the operational or medical use, handling or storage of radioactive material (RAM), or devices and commodities containing RAM. It does not apply to activities using radioactive materials transferred from the Department of Energy to the Department of Defense in accordance with Section 91B of the Atomic Energy Act of 1954, as amended. Presidential Executive Order 12344, statutorily prescribed by Public Law No. 98-525, 42 U.S.C. § 7158 note (1984), establishes the responsibilities and authorities of the Director, Naval Nuclear Propulsion Program (OP-OON) (who is also the Deputy Commander, Nuclear Propulsion Directorate in the Naval Sea Systems Command), including prescription of standards and requirements for the control and disposition of radioactive materials associated with the program. Accordingly, the provisions of this notice do not apply to the management of radioactive materials associated with the Naval Nuclear Propulsion Program.

3. **Cancellation.** NAVSUPINST 5101.9B.

4. **Background.** Reference (a) established the Navy Radiation Safety Committee (NRSC) to control the use of RAM within Navy and Marine Corps. This responsibility includes its ultimate disposal. References (b) and (c) establish

Commander, Naval Sea Systems Command (COMNAVSEASYS COM) as the program manager for the disposal of radioactive waste. Significant changes in national policy and federal regulations concerning the disposal of LLRW have made it necessary to institute a program which is both responsive to the user and cost effective.

5. **Discussion.** The Navy LLRW disposal program provides a means to minimize quantities of RAM stored at sites worldwide and reduces the potential for radioactive contamination and personnel radiation exposures. The central component of the program is an Interservice Support Agreement (ISSA) between DON and Department of the Army (DOA) for consolidation, compaction and burial of LLRW. In the ISSA, the waste generator will normally pay only transportation costs, not actual burial costs. In those cases requiring extensive on-site assistance, other costs may apply. This ISSA will not only yield a cost savings, but will also provide a positive method of controlling and recording for posterity individual LLRW shipments.

6. **Definition**

a. For the purposes of this program, LLRW is defined as:

- (1) Surplus, unwanted or unserviceable devices, commodities, instruments and articles readily identifiable as containing radioactive material.
- (2) Radioactive material for which there is no longer a useful purpose.
- (3) Property contaminated with radioactive material to the extent that decontamination is economically unfeasible.
- (4) Radioactive residue from decontamination operations.

ENCLOSURE ( 1 )





(5) Animal tissue contaminated with radioactive material except as noted below.

**NOTE:** Before the items listed in (a) (1) and (a) (2) above are declared LLRW, every attempt shall be made to have them returned to the manufacturer or transferred to another activity or facility that has a use for and is authorized to possess the material. They should be declared waste only after such actions are unsuccessful.

b. For the purposes of this program, LLRW does NOT include:

(1) 0.05 microcuries, or less, of Hydrogen-3 or Carbon-14 per gram of medium used for liquid scintillation counting.

(2) 0.05 microcuries, or less, of Hydrogen-3 or Carbon-14 per gram of animal tissue, averaged over the weight of the entire animal.

(3) Excreta from individuals undergoing medical diagnosis or therapy with radioactive material.

(4) Radioactive material which is held for disposal by decay-in-storage or transferred to a commercial contractor authorized to receive the material for disposal by decay-in-storage.

### 7. Responsibilities

a. The Deputy Chief of Naval Operations (Logistics) (OP-04) is the resource sponsor for the program. The NRSC, chaired by Director, Environmental Protection, Safety and Occupational Health Division (OP-45) administers the program and shall:

(1) Be the sole point of contact with LLRW regional compacts, and state, federal and foreign agencies regarding Navy LLRW policy for radioactive materials within the scope of this notice.

(2) Be the routine point of contact between DON and the Nuclear Regulatory

Commission (NRC) concerning disposal of NRC licensed material.

(3) Provide guidance and resources to the program manager for execution of the LLRW program.

b. COMNAVSEASYSKOM (SEA-06GN) is the program manager and shall:

(1) Issue directives governing the program for disposal of LLRW.

(2) Provide management oversight of the operation of the LLRW disposal program.

c. Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO) is designated as the technical support center for execution of the program and shall:

(1) Manage the daily routine operation of the LLRW disposal program.

(2) Provide authorization and specific written instructions to Navy and Marine Corps activities for each LLRW disposal transaction.

(3) Develop and maintain current operating procedures for disposal of classes of LLRW.

(4) Be the Navy agent for administration and operation of the ISSA with DOA.

(5) Maintain permanent records of each Navy and Marine Corps LLRW disposal transaction.

(6) Provide SEA 06GN and OP-45 with quarterly statistical summary of the LLRW disposal program and estimates of LLRW volume awaiting disposal.

d. Commanding Officers and Officers in Charge shall:





OPNAVNOTE 5100  
7 April 1992

(1) Dispose of LLRW only through this program unless an alternate method is authorized in the applicable Navy Radioactive Materials Permit or by OP-45. Existing contracts for disposal of LLRW may continue in effect until complete.

(2) Dispose of LLRW only under authorization from NAVSEADET RASO.

(3) Comply with instructions and guidance issued by NAVSEA 06GN and NAVSEADET RASO for every LLRW disposal action.

8. Action. Navy and Marine Corps activities shall:

a. Institute actions with the technical support center NO LATER THAN 1 SEPTEMBER 1992 to arrange for disposal of all stored LLRW in accordance with this notice.

b. Dispose of all other LLRW by coordination with the technical support center as it is generated, rather than storing LLRW until large volumes are accumulated. LLRW should not routinely be accumulated or stored for periods greater than ninety days. LLRW shall not be shipped to SEA 06GN or NAVSEADET RASO.

S. F. LOFTUS  
Deputy Chief of Naval  
Operations (Logistics)

Distribution:  
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DEPARTMENT OF THE NAVY  
NAVY ENVIRONMENTAL HEALTH CENTER  
2510 WALMER AVENUE  
NORFOLK, VIRGINIA 23513-2617



6470  
Ser 31np/ 1552  
JAN 30 1992

From: Commanding Officer, Navy Environmental Health Center  
To: Distribution List

Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Encl: (1) NAVSEA DET RASO Yorktown VA 271400Z Jan 92

1. Enclosure (1) announces an interservice support agreement with the U.S. Army, to allow Navy use of Army resources and the Defense Consolidation Facility (DCF) for disposal of low level radioactive waste. The Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEA DET RASO), Yorktown, VA has been tasked with the execution of the Navy LLRW disposal program using Army resources and the DCF.
2. Paragraphs 2.A and 2.B of enclosure (1) define what is and is not considered LLRW for purposes of this program. Radioactive material that is held for decay-in-storage or transferred to a commercial contractor authorized to receive the material for disposal by decay-in-storage as authorized by your Navy Radioactive Material Permit is not considered LLRW for purposes of this program.
3. It is anticipated that for routine disposal actions, the only cost incurred by your Command will be for transportation of the LLRW to the Defense Consolidation Facility located in South Carolina.
4. On 1 January 1993 there will be a significant increase in the disposal costs for LLRW charged to the Navy. Depending on your location you may have to store LLRW for an undetermined period of time after 1 January 1993. Therefore you shall dispose of all LLRW at your Command prior to 1 January 1993 using the Navy LLRW disposal program.
5. Paragraph 2.D of enclosure (1) states the requirements for requesting disposal of LLRW from NAVSEA DET RASO. A copy of all requests for disposal of LLRW shall be sent to the Navy Environmental Health Center (NAVENVIRHLTHCEN).
6. Point of contact at NAVENVIRHLTHCEN is LCDR G. I. Snyder, MSC, USN (NEHC 31), DSN: 564-4657, Commercial: (804) 444-4657, Ext. 413.

ENCLOSURE (2)



Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

7. Point of contact at NAVSEA DET RASO is Mr. Richard W. Loman, DSN: 953-4692, Commercial: (804) 887-4692.

*G. I. Snyder*  
**G. I. SNYDER**  
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