Current Status of WCS Licenses and Services

Presented at the
WM 2011

By: Bill Dornsife, Executive VP Licensing
March 1, 2011
Construction is underway
Site Progress

- Bonds issued December 2010
- CWF property has been deeded to the State of Texas – WCS will lease and operate the facility
- Construction started January 10, 2011 with an estimated 9 month schedule to complete
- Targeting start of LLRW disposal operations Q4 2011 after TCEQ approval
- Utility audit scheduled for March 7-10
- Staffing up
Facility Layout

- LSA Pad
- BPF
- FWF
- CWF
- Extended Rail Loop
- Future Rail Tipper
- RCRA Cell
- Expansion Area
TX Compact Waste Disposal Facility

- 2,310,000 cubic feet and 3,890,000 curies
- License Term - 15-years with unlimited opportunities for 10-year renewals
Containerized Waste Only

• Class A
  – DAW
  – High Density
  – Resin and High Dose Rate

• Class B/C
• Irradiated Hardware
• Large Components
• Sealed Sources
Texas Compact Commission (TCC) approved Import & Export rules January 4, 2011

- VT Commissioners replaced by new Governor Peter Shumlin February 1, 2011

- Rules published in the Texas Register February 4th
Import Rules

- Import volumes will be limited to assure disposal capacity TX & VT generators; VT guaranteed 20% of capacity
- WCS has prepared a Capacity Report based on recent forecasts that demonstrates sufficient capacity for reasonable importation from out-of-compact states.
- WCS will submit a blanket petition for reasonable importation and make it available to generators on a first-come basis. This will help TCC manage import petitions.
- Generators may submit individual import petitions to TCC
- TCC is expected to take 6-12 months to approve import/export petitions
- Import agreements must be finalized with the TCC prior to disposal of LLRW
- Fees may be assessed
- Regulatory compliance record will be considered
Waste Control Specialists LLC

Rate Setting

- WCS application submitted in June 2010 and responded to TCEQ comments in October 2010 and January 2011
  - Reasonable importation of waste is required to serve a national need and to ensure economic viability of the facility
  - Based on recent waste projections long-term capacity will be maintained for In-Compact generators
  - Prior year investments were excluded from proposed maximum disposal rates for in-Compact generators
  - Rate setting rules allow contracting at disposal rates less than maximum rates set by TCEQ
  - No risk in executing disposal contracts now. WCS will hold contract pricing or honor maximum rate set by TCEQ if lower than contract price
Waste Profiling

- Chemical, Physical and Radiological properties
  - Part 61 analysis, generator knowledge
  - SNM limits – 350/200 grams for U and PU

- Packaging
  - DOT approved containers - Drums, boxes, HICs, Liners
  - Voids less than 15% in containers
  - Most waste must be containerized – disposal in 7’8”W x9’6” L x 9’2” H rectangular or 6’8” Dia. X 9’2” H canister
  - Free liquids < 1% of waste volume
  - Large components approved on a case-by-case basis

- Transportation
  - Truck transport only; future amendment for rail receipt
Generator Certification

• Facility audits required for certain wastes that are not conducive to inspection or sampling upon receipt
  – NRC Inspections/audits may be utilized w/ TCEQ approval

• Program reviews
  – Sampling and analytical procedures and frequency
  – QA/QC procedures
  – Procedures for ensuring free liquid and void space limits are met
  – Process Control Program
  – Shipping Program
  – Regulatory history
Contracting Approach

- WCS Environmental Service Agreement
- Disposal Pricing
  - Based on volume and activity
  - Volume discounts
  - Curie fee for high activity wastes based on license limits
  - Potential surcharge for high C-14 content
  - Accurate waste data enable accurate pricing
• WCS is not above or adjacent to any underground drinking water supply
• Texas state water map confirms site characteristics
• Hydraulic conductivity of clay is $1 \times 10^{-9}$ cm/sec and the 225-foot zone is $1 \times 10^{-8}$ cm/sec
• Horizontal groundwater travel is 4 feet (1.3 meters) per 1,000 years
• Groundwater is ~16,000 years old
Subsurface Characterization Activities at WCS Have Been Extensive

Over 596 wells/soil borings, including:
- 448 monitoring wells
- Over 130 uncased soil borings
- 18 instrumented boreholes

Numerous geologic/hydrologic investigations, including:
- 15 major geologic studies
- 18 major hydrogeologic studies
- Nine geophysical investigations
• Understand and meet customer needs
• Contract for disposal service
• Begin Disposal Operations