



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 29, 2020

MEMORANDUM TO: Stephen Koenick, Chief
Low-Level Waste and Projects Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

FROM: Lloyd Desotell, Project Manager Lloyd T. Desotell Digitally signed by Lloyd T. Desotell
Date: 2020.09.29 08:01:52 -04'00'
Low-Level Waste and Projects Branch
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF SEPTEMBER 14, 2020, TELECONFERENCE
REGARDING THE IMPLEMENTATION STATUS OF
NUREG/BR-0204 REVISION 3 AND ASSOCIATED NRC FORMS

On September 14, 2020, the U.S. Nuclear Regulatory Commission (NRC) held a Category 2 public teleconference where the NRC staff provided industry representatives, licensees, and vendors a status update regarding the implementation of NUREG/BR-0204, Revision 3, and the associated revisions to NRC Forms 540, 541 and 542.

The teleconference was noticed on the NRC's public Web site on August 31, 2020, and the notice and meeting agenda is available in the NRC's Agencywide Documents Access and Management System at Accession No. ML20244A327.

During this teleconference NRC staff stated that it had received several requests to delay implementation of the revisions to NRC forms 540, 541 and 542 associated with NUREG/BR-0204, "Instructions for Completing NRC's Uniform Low-Level Radioactive Waste Manifest," Revision 3. NRC staff stated that in response to those requests as well as other considerations, the NRC has decided to delay the implementation of NUREG/BR-0204, Revision 3 until further notice and is currently in the process of changing NRC Forms 540, 541 and 542 back to the January 2020 versions, which may take one month to complete. NRC staff noted that in the interim, based on the definitions section of Appendix G to 10 CFR Part 20, licensees need not use originals of the NRC uniform waste manifest forms as long as any substitute forms are equivalent to the original documentation in respect to content, clarity, size, and location of information. NRC staff also noted it would issue a *Federal Register* Notice to this effect. This *Federal Register* Notice is scheduled to publish on September 30, 2020.

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No comments from members of industry were offered when NRC staff asked if there would be a burden to industry if NRC delayed implementation of NUREG/BR, Revision 3. NRC staff noted that they wanted to ensure that there were no unintended consequences if the implementation of the revisions to NRC forms 540, 541 and 542 associated with NUREG/BR-0204, Revision 3 was delayed.

Several commenters stated their desire to delay implementation of the forms associated with NUREG/BR-0204, Rev. 3 until March 31, 2021.

The NRC staff did not commit to a specific timeframe for implementation of NUREG/BR-0204 Revision 3 rather they stated they plan to have a meeting to discuss future implementation of NUREG/BR-0204, Revision 3.

No comments from members of the public or state regulators were offered when requested before the end of the meeting.

Enclosure:
List of Attendees

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IMPEMENTATION STATUS OF NUREG/BR-0240 REVISION 3 AND ASSOCIATED
NRC FORMS DATE: September 29, 2020

DISTRIBUTION:

Karen Pinkston	David Garmon	Bo Pham	James Adler
Lloyd Desotell	Patricia Holahan	Bill Rautzen	Stephen Koenick
Kathy Modes	Cynthia Jones	David Pstrak	Don Lowman
Camille Levine	Jason Draper	Chris McKenney	Adam Schwartzman
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OFFICE	DUWP/LLWPB	DUWP/LLWPB
NAME	LDesotell	SKoenick
DATE	9/28/20	9/29/20

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Attendee List

NRC

Adam Schwartzman
Patricia Holahan
Karen Pinkston
Chris McKenney
Stephen Koenick
Lloyd Desotell
Bo Pham
James Adler
David Pstrak
Robert Gladney
Don Lowman
Kathy Modes
David Garmon
Bill Rautzen
Cynthia Jones
Camille Levine
Jason Draper

State Regulators

Rich Janati
Lisa Bruedigan
Eric Skotak
Rusty Lundberg
Earl Fordham
Cheryl Rogers
Gregorio Rosado
Kristen Schwab

Members of Industry/Public

Heather Sulliva
Steven Berger
Cameron Pelzer
Bret Rogers
Lee Villalobos
Vern Rogers
Mark Lewis
Jason Jones
James Leonard
Michael Wiskerchen
Mike Cecalupo
Rob Newton
David Kania
David Tolbert
Dan Davis
Janet Schlueter
Daniel Shannon
Robert Bishop

Wilson Yarbrough
Nick Harmon
Marc Pawlowski
Glen Vickers
Clint Miller
Sandra Koss
Greg Haught
Dylan Long
Philip Simpkin
Jaime Barnes
Wenjia Liu
Quachel Bazile
Michael Maier
Fay Saremi
Douglas Hatch
Wm. Stetson Boyd
George Greene
Tiffanee Navarro
Tyler Smith
James Young
Amaryl Morie
Josie Piccone
Sean Austin
John Andoe
Charles Deible
Vincent Murphy
Stephen Nance
Lane Howard
Patrick Eures
Camille Zozula
Tim Martinson
Alaa Albudairi