



WASTE CONTROL SPECIALISTS

October 11, 2022

United States Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attn: Rulemakings and Adjudications Staff

Subject: Waste Control Specialists comments regarding the collection renewal for the Low-Level Waste Uniform Waste Manifest Forms (Form 540/A, 541/A, 542/A)

Reference: Docket ID NRC-2021-0043, NRC-2021-0044 and NRC-2021-0045

To Whom It May Concern:

Waste Control Specialists LLC (WCS) is pleased to provide our comments to the Nuclear Regulatory Commission's (NRC) recent published Federal Register Notices announcing their intent to submit information collection requests to the Office of Management and Budget (OMB) for NRC Forms 540 and 540A – Uniform Low-Level Radioactive Waste Manifest (Shipping Paper) and Continuation Page, NRC Forms 541 and 541A – Uniform Low-Level Radioactive Waste Manifest Container and Waste Description and Continuation Page and NRC Forms 542 and 542A – Uniform Low-Level Radioactive Waste Manifest Index and Regional Compact Tabulation and Continuation Page.

Attached are WCS's responses to the following questions, 1-4.

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?
2. Is the estimate of the number of annual responses, the number of annual respondents, and the burden of the information collection accurate?
3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

DALLAS OFFICE

Waste Control Specialists LLC
17103 Preston Road, Suite 200
Dallas, TX 75248
P 682.503.0030
F 214.853.5720

FACILITY

Waste Control Specialists LLC
P.O. Box 1129
Andrews, TX 79714
P 432.525.8500
F 432.525.8902

October 11, 2022

Letter to NRC

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

I appreciate the opportunity to provide comments to the NRC and appreciate your consideration of our comments. If you have any questions, please do not hesitate to call me at (682) 503-0030.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Shaw".

Chris Shaw
Licensing Manager
Corporate Radiation Safety Officer
Waste Control Specialists LLC

Cc: Electronic Copy Only

Dave Carlson, WCS
Jay Britten, WCS
Ryan Williams, WCS
Gregory G. DiCarlo
WCS Records
WCS Regulatory Compliance

Revised Response

REFERENCE: Dockets NRC-2021-0043, NRC-2021-0044, and NRC-2021-0045

WCS is thankful for the opportunity to provide responses to the NRC's questions regarding the information collection renewal for the Low-level Waste (LLW) Uniform Waste Manifest Forms (Form 540/A, 541/A, 542/A).

The NRC's questions with WCS responses

The NRC is seeking comments that address the following questions:

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility? Please explain your answer.

WCS Response: Yes.

WCS provides the information gathered from Uniform Low-Level Radioactive Waste Manifest receipts to the state of Texas as required under Texas Agreement State rules and to the Department of Energy under the Manifest Information Management System (MIMS).

2. Is the estimate of the number of annual responses, the number of annual respondents, and the burden of the information collection accurate? Please explain your answer.

WCS Response: WCS believes the estimate of burden of information is close to being accurate accounting for activity data calculations and DOT calculations prior to completing the forms.

WCS Personnel generated 609 Uniform Low-Level Radioactive Waste Manifests during calendar year 2021. These manifests would not require NRC form 542. Using the estimated time to complete NRC Forms 540 & 541 only, 4.05 hours, the burden to WCS during the year 2021 was 2466 man-hours.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

WCS Response: WCS believes the Uniform Low-Level Radioactive Waste Manifest in its current configuration adequately addresses NRC Licensee requirements for data collection and conveyance.

4. How can the burden of the information collection on respondents be minimized, including the use of automated collection techniques or other forms of information technology?

WCS Response: Most respondents WCS encounters are currently using one form or another of Uniform Low-Level Radioactive Waste Manifest generator such as RadMan or LowTrack to create manifests. Over time, these programs have become more user-friendly as more respondents have the need to produce multiple manifests on a yearly basis.