

To: West Valley Citizen Task Force  
From: Bill Logue, Citizen Task Force Facilitator  
Date: November 27, 2018  
Subject: **Summary of the November 13, 2018 Technical Work Group Call**

## **Technical Work Group Members and Alternates Participating on the Call**

Charlie Davis, Barbara Frackiewicz, Tony Memmo, Ray Vaughan.

At the outset of the call, Charlie Davis informed the group that he would be traveling to the Energy Communities Alliance (ECA) meeting the following day and that the HLW interpretation would be a topic of discussion at that meeting.

The Technical Work Group members discussed the process of commenting and specific comments. The discussion centered on two issues applicable to the definition generally and two issues specific to the West Valley Demonstration Project (WVDP).

With respect to the general issues: 1) the question was raised as to whether the proposed interpretation could open the door to dilution of waste either by mixing with other materials or by inclusion of adjacent materials; and 2) any performance assessment would need to be transparent and field verifiable because a determination would be dependent on the quality of the performance assessment. An example at WVDP of the first issue would be the grouting of the HLW tanks in place.

With respect to the WVDP site specific issues: 1) the definitions under the WVDP Act is independent of the Nuclear Waste Policy Act with each having its own definition of HLW; therefore, any reinterpretation based on the NWPA would not apply to WVDP; and 2) the reliance by DOE on 10 CFR 61.55 and related provisions needs to be tied to the Stipulation of Compromise at WVDP. On this latter point, the discussion noted that this was similar to the reinterpretation of Waste Incidental to Reprocessing that was used in connection with the Melter from the vitrification process.

Following discussion of the above items, Ray Vaughan agreed to draft a letter and circulate it for input from the Technical Work Group. Following incorporation of input the comments will be circulated to the full CTF.