

### **3. CONCLUSIONS**

This report demonstrates EnergySolutions' continued regulatory compliance resulting from their proposed disposal of depleted uranium as Class A waste. As such, it is concluded that acceptance and disposal of depleted uranium produced at DOE's Savannah River Site can be completed compliant with URDR regulatory requirements. Furthermore, this report also demonstrates that EnergySolutions may accept and dispose of similar depleted uranium waste from the gaseous diffusion plants at Portsmouth, Ohio and Paducah, Kentucky, and depleted uranium waste from the National Enrichment Facility currently under construction in New Mexico (up to the limits and configurations modeled in the Performance Assessment).

EnergySolutions further supports their claims of compliance with URDR Rules through the development and execution of a detailed, site-specific, probabilistic performance assessment using the GoldSim model. This model and the resulting findings demonstrate to the Division that EnergySolutions' proposed methods for disposal of depleted uranium will ensure that future operations, institutional control, and site closure can be conducted safely, and that the site will comply with the Division's radiological criteria contained in the URDR.

While included in this Compliance Report as part of improving qualitative understanding of facility performance, EnergySolutions agrees with NRC cautions and recognizes that regulatory compliance should include limited, "consideration given to the issue of evaluating site conditions that may arise from changes in climate or the influences of human behavior should be limited so as to avoid unnecessary speculation" (NRC, 2000). Furthermore, "[t]hese events are envisaged as broadly disrupting the disposal site region to the extent that the human population would leave affected areas as the ice sheet or shoreline advances. Accordingly, an appropriate assumption under these conditions would be that no individual is living close enough to the facility to receive a meaningful dose." (NRC, 2000).