

**NRC Form 541 Uniform Low-Level Waste Manifest (Container and Waste Description)
and
NRC Form 541A Uniform Low-Level Waste Manifest (Container and Waste Description
[Continuation])**

**OMB 3150-0166
Non-Substantive Change Request**

The NRC is submitting this Non-Substantive Change Request to update NRC Forms 541 and 541A, “Uniform Low-Level Radioactive Waste Manifest (Container and Waste Description)” and “Uniform Low-Level Radioactive Waste Manifest (Container and Waste Description [Continuation])”, respectively. NRC Form 541 must be completed for shipments of low-level radioactive waste intended for disposal at a licensed land disposal facility. The disposal facilities and associated Agreement States, if applicable, use the information found on the forms to ensure safe burial of the waste for the protection of the public and environment.

In this non-substantive change request, the NRC proposes combining Column 8, “Waste and Container Weight (kg)” and Column 9, “Waste Weight (kg)”, into one column, Column 8 with the header “Waste and Container Weight (kg)”. This change would result in the information to be provided on NRC Forms 541 and 541A being consistent with that previously approved by OMB in January 2020.

In a previous non-substantive change request for NRC Forms 541 and 541A, the NRC proposed to divide Column 8, “Waste and Container Weight”, into two columns: a Column 8 requesting the weight of the waste plus its container and a Column 9 requesting the weight of the waste without its container. The NRC proposed this change in response to a comment from an industry stakeholder and was approved by OMB in April 2020.

Since the revised NRC Forms 541 and 541A were approved in April 2020, the NRC has received feedback from numerous stakeholders that the change (i.e., dividing the “Waste and Container Weight” column into two columns) would require some additional effort to implement and that more time would be needed to make this change especially in light of the COVID-19 pandemic. The reason given for this by the stakeholders is that many stakeholders use software packages to generate the information on the NRC Form and to print out the form. The stakeholders reported that the process for making and implementing these changes under their quality assurance protocols can be time consuming. Because of this, the NRC is requesting that the current version of NRC Forms 541 and 541A in use should be changed to recombine Columns 8 and 9 into one column in which the total weight of the waste and container is reported (consistent with the forms renewed in January 2020).

No change in burden is anticipated as a result of these changes. Many of the industry processes for completing the form have not yet been updated to include explicitly printing out the “Waste and Container Weight” and “Waste Weight” separately on the forms. Additionally, NRC Forms 541 and 541A with a combined “Waste and Container Weight” column have been used by stakeholders for over 20 years.

No new information will need to be developed by the shippers who complete the form as a

result of the changes. Additionally, the changes to the form address a concern raised by industry stakeholders.