

**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.

The NRC proposes 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 proposes this change to address a comment from an industry stakeholder. This commenter noted that although NRC Form 541 had a space to input the “net waste weight” for the entire shipment in Section 1 and a space to input the “waste and container weight” for an individual container in Column 8, there was no way to determine the weight of the waste in the individual containers when a shipment consisted of more than one container from the information on the form. The commenter noted that this information is important for both processors and the disposal sites for determining disposal weights and for evaluating the characteristics of a specific container for lifting or shipping purposes. Therefore, this change provides a clarification that allows for more efficient processing and disposal. The NRC also plans to make some “de minimis” changes to NRC Forms 541 and 541A, as well as NRC Forms 540, 540A, 542, and 542A. These changes include renumbering the columns on NRC Forms 541 and 541A to account for the proposed new column, adjusting the formatting of the forms, and making slight clarifying changes to wording based on stakeholder input.

Although the current version of Forms 541 and 541A do not have a place to report the weight of waste in a specific container, the shippers do currently need to know the weight of the waste in a specific container to determine the input for other items on NRC Forms 541 and 541A, such as the weight percent of a chelating agent (Column 14 on currently approved form), the total activity of particular radionuclides in the waste (Column 15 on currently approved form), and the waste class (Column 16 on currently approved form). For this reason, no additional work would be required by shippers to develop the information requested in the new column.

No change in burden is anticipated as a result of these changes. No new information will need to be developed by the shippers who complete the form as a result of the changes. It is anticipated that having a place on the form to explicitly state the waste weight will improve the usability of the form, increase transparency, and allow users of the forms to manage the shipping and disposal of Low-Level Radioactive Waste in a more efficient manner.

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

Draft revised NRC Forms 541 and 541A were issued for public comment along with a revision to the instructions for completing these forms (83 FR 54620). No comments were received on the change to the form to divide Column 8, "Waste and Container Weight", into a column requesting the waste and container weight and a column requesting the weight of the waste.