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May 29, 2015

MEMORANDUM

TO:

Senator Michael Thibodeau, President of the Senate, and Representative Mark

May & Maigher

Eves, Speaker of the House

FROM:

Mary C. Mayhew, Commissioner

Department of Health and Human Services

SUBJECT: State Nuclear Safety Inspector's October-December 2013 Monthly Reports to the

Legislature on the Interim Spent Fuel Storage Facility in Wiscasset, Maine

Legislation enacted in the spring of 2008 requires the State Nuclear Safety Inspector to provide monthly reports to the President of the Senate, Speaker of the House, the U.S. Nuclear Regulatory Commission, and Maine Yankee. The reports focus on activities at the site and include highlights of the national debate on storing and disposing of the used nuclear fuel. For your convenience, highlights of local and national events are captured in the executive summary of the reports.

The enclosed reports provide the information required under Title 22 of the Maine Revised Statutes Annotated §666, as enacted under Public Law, Chapter 539, in the second regular session of the 123rd Legislature.

Should you have questions about its content, please feel free to contact Mr. Patrick J. Dostie, State Nuclear Safety Inspector, at 287-6721.

MCM/klv

Enclosure

cc: Mark Lombard, U.S. Nuclear Regulatory Commission

Monica Ford, U.S. Nuclear Regulatory Commission, Region I

J. Stanley Brown, Independent Spent Fuel Storage Installation Manager, Maine Yankee Holly Lusk, Senior Health Policy Advisor

Kenneth Albert, Director, Maine Center for Disease Control and Prevention

Patricia W. Aho, Commissioner, Department of Environmental Protection

Timothy Schneider, Maine Public Advocate

Lieutenant Scot Ireland, Special Services Unit, Maine State Police

Nancy Beardsley, Director, Division of Environmental Health

Jay Hyland, PE, Manager, Radiation Control Program

State Nuclear Safety Inspector Office Maine CDC – DHHS

December 2013 Monthly Report to the Legislature

Executive Summary

As part of the State's long standing oversight of Maine Yankee's nuclear activities, legislation was enacted in the second regular session of the 123rd Legislature and signed by Governor John Baldacci requiring that the State Nuclear Safety Inspector prepare a monthly report on the oversight activities performed at the Maine Yankee Independent Spent Fuel Storage Installation (ISFSI) facility located in Wiscasset, Maine.

The report covers activities at the storage facility, including the State's on-going environmental radiation surveillance and the national debate over the licensing and construction of a geologic repository for the disposal of spent nuclear fuel. The report's highlights assist readers to focus on the significant activities that took place both locally and nationally during the month.

The national highlights primarily focused on Nuclear Regulatory Commission (NRC) and federal court activities.

Local

• Maine Yankee submitted to the Nuclear Regulatory Commission (NRC) revision 2 of its Post-Shutdown Decommissioning Activities Report. The report was updated to indicate that Maine Yankee's decommissioning was completed, except for 12 acres remaining that included the ISFSI and a small parcel of land adjacent to the ISFSI. Besides editorial and administrative changes the revision also removed the list of specific low-level waste sites as their future availability was questionable since the decommissioning of the ISFSI could be two decades or more away and highly dependent upon the federal government's removal of the spent nuclear fuel and reactor internals from the site. Moreover, the revision also included Maine Yankee's new cost estimates of \$26.8 million in 2013 dollars for decommissioning the ISFSI in 2033. The revision further concluded that the environmental impacts from the ISFSI decommissioning would be minimal and were bounded by previous assessments.

The national highlights primarily focused on the NRC and federal court activities.

National:

- The Department of Energy's (DOE) Office of Inspector General issued an audit report on DOE's management of the Nuclear Waste Fund (NWF) for Fiscal Year 2013. The independent certified public accountants' review concluded that there were no deficiencies or instances of noncompliance warranting a disclosure and that the financial statements presented fairly the financial positions of the Fund for the years ending on September 30 of 2012 and 2013. According to the report the NWF had a balance of \$34.1 billion as of the end of September, 2013 with interest on the account accruing at over \$1.3 billion per year.
- The U.S. Court of Appeals for the D.C. Circuit issued an Order denying the DOE's petition for a 31 day extension to allow DOE time to request a rehearing on the Court's November 19 Order to forward to Congress a reduction in the NWF fee to zero. In addition, the Court further ordered the petitioners' motion for expedited issuance be granted and directed the Clerk of the Court to do so immediately.

Introduction

As part of the Department of Health and Human Services' responsibility under Title 22, Maine Revised Statutes Annotated (MRSA) §666 (2), as enacted under Public Law, Chapter 539 in the second regular session of the 123rd Legislature, the foregoing is the monthly report from the State Nuclear Safety Inspector.

The State Inspector's individual activities for the past month are highlighted under certain broad categories, as illustrated below. Since some activities are periodic and on-going, there may be some months when very little will be reported under that category. It is recommended for reviewers to examine previous reports to ensure connectivity with the information presented as it would be cumbersome to continuously repeat prior information in every report. Past reports are available from the Radiation Control Program's web site at the following link: www.maineradiationcontrol.org and by clicking on the nuclear safety link in the left hand margin.

Commencing with the January 2010 report, the glossary and the historical perspective addendum are no longer included in the report. Instead, this information is available at the Radiation Control Program's website noted above. In some situations the footnotes may include some basic information and may redirect the reviewer to the website. In October 2011, the format of the report was changed to include an executive summary which replaced the official memorandum to the legislative leadership transmitting the report. To further streamline efforts beginning in August 2012, the report featured hyperlinks to documents that would normally be attached as copies to the report. The hyperlinks should facilitate the reports review with some readers focusing on the report while others who wish to explore the cited documentation can do so.

Independent Spent Fuel Storage Installation (ISFSI)

During December, the general status of the ISFSI was normal, with no instances of spurious alarms due to environmental conditions.

There was one fire-related impairment and it was associated with a planned removal of a records storage vault. The paper documents were removed from the storage vault and temporarily stored in the building's truck bay. Periodic fire rounds were instituted until the papers were removed.

There was no security-related impairment for the month. However, there were four security events logged for the month and all involved transient environmental conditions.

There were nine condition reports¹ (CR) for the month and they are described below.

- 1st CR: Documented ice building up in the Storage Building from leaking water. The cause was determined to be improper grading and door sills leaking. The area was regarded but various other repairs will be performed in warmer weather.
- 2nd CR: Documented an exterior, non-security door not operating properly. The door vendor was contacted and recommended a sill replacement during warmer weather.
- 3rd CR: Was written to document the vehicle gate not operating properly. The cause was found to be a switch that had frozen up due to the weather. The ice was cleared and the gate worked properly the next day.
- 4th CR: Was written to document a buried service vault collecting water. The vault was pumped out and is periodically monitored and pumped when necessary.
- 5th CR: Was written as to document a small fuel leak on a man-lift while parked in the Storage Building. The fuel valve was immediately tightened and about two ounces of fuel was cleaned up.

¹ A condition report is a report that promptly alerts management to potential conditions that may be adverse to quality or safety. For more information, refer to the glossary on the Radiation Program's website.

6th CR: Documented an individual losing their keycard. The card was immediately deactivated and a new card issued. The original keycard was found two days later and destroyed.

7th CR: Documented that an alarm system was not properly tested after a brief interruption of internet service due to offsite system problems. The system was tested satisfactorily the same day. In addition, the procedure was changed to clarify that system testing is required regardless of the length of the system outage.

8th CR: Documented that an inventory log sheet was missing for one day during records processing. The sheet was never found and a note was placed in the records file indicating that the sheet as

missing for one day.

9th CR: Was written to document that some electronic forms templates in the forms folder contained duplicates and various revisions. The duplicates and incorrect revisions of forms were removed from the folder.

Other ISFSI Related Activities

1. On December 12, Maine Yankee submitted to the NRC revision 2 of its Post-Shutdown Decommissioning Activities Report. The report was updated to indicate that Maine Yankee's decommissioning was completed, except for 12 acres remaining that included the ISFSI and a small parcel of land adjacent to the ISFSI. Besides editorial and administrative changes the revision also removed the list of specific low-level waste sites as their future availability was questionable since the decommissioning of the ISFSI could be two decades or more away and highly dependent upon the federal government's removal of the spent nuclear fuel and reactor internals from the site. Moreover, the revision also included Maine Yankee's new cost estimates of \$26.8 million in 2013 dollars for decommissioning the ISFSI in 2033. The revision further concluded that the environmental impacts from the ISFSI decommissioning would be minimal and were bounded by previous assessments.

Environmental

The environmental information is published on a quarterly basis. There was no new information to report this month.

Other Newsworthy Items

- 1. On December 2, the DOE sent a letter to the Chair of the House's Subcommittee on Environment and the Economy providing a monthly update of the DOE's activities and expenditures on the Yucca Mountain licensing process. The letter listed four activities DOE performed during September. They included their submission to the NRC on how they should proceed with the restart of the Yucca Mountain licensing proceeding, payments to the pension funds of retired Yucca Mountain workers, the fee adequacy assessment, and the maintenance of Yucca Mountain information. The DOE noted that these efforts amounted to \$593,000 in expenditures. The web link for the letter can be accessed by positioning the cursor over the underlined text and following the directions.
- 2. On December 2, the NRC held a public meeting in Perrysburg, Ohio to receive public comments on their Waste Confidence Proposed Rule and Draft Generic Environmental Impact Statement (DGEIS) supporting the Proposed Rule. One hundred and twenty-eight people attended the meeting that included members of the public, industry, public advocacy groups, representatives from the Michigan Department of Environmental Quality and the Ohio Department of Health, and the Ottawa County Commissioners. 45 provided comments. Besides support for renewable energy and stopping making more nuclear waste, some commenters expressed general opposition to nuclear power, the Waste Confidence rulemaking and the limited public comment period. Some criticized the DGEIS assumptions, including institutional

controls, and NRC's evaluation of risk from accidents, especially those caused by flooding on the Great Lakes and climate change impacts on safe storage of spent fuel. Others raised concerns on the health effects of radiation, NRC oversight, safety of dry casks, Fukushima, General Electric boiling water reactors, and specific issues relative to local nuclear power plants. The web link for the meeting summary can be accessed by positioning the cursor over the underlined text and following the directions. Due to the government shutdown several public meetings initially scheduled for November were rescheduled for December. They included Minnetonka, Minnesota on December 4 and Rockville, Maryland on the 9. Participation ranged from 45 people in Minnetonka to 71 in Rockville. Individual commenters at the public meetings ranged from 17 to 24. The concerns expressed at each of the public meetings raised very similar themes to those expressed in Perrysburg, Ohio. The web link for the meeting summaries for Minnetonka and Rockville can be accessed by positioning the cursor over the underlined texts and following the directions.

- 3. On December 3, the DOE filed a motion with the U.S. Court of Appeals for the District of Columbia Circuit to increase the time allowed by 31 days for the DOE to request a rehearing en banc (before the full Court) on the Court's November 19 Order to suspend the its nuclear collection fee. The concern expressed by DOE was that some of their counsel being assigned to six other response briefs and Thanksgiving, Christmas, New Year's, and other religious holidays would impact on their ability to petition for review within the 45 day timeframe allotted. The web link for the motion can be accessed by positioning the cursor over the underlined text and following the directions.
- 4. On December 4, the National Association of Regulatory Utility Commissioners (NARUC) filed a motion with the Court of Appeals for the D.C. Circuit to expedite the issuance of the Court's November 19 mandate to suspend the nuclear fee collection by submitting to Congress a proposal to change the fee to zero. The petitioners' request was predicated on DOE's historical disposition to delay, the approximate \$3 billion paid by ratepayers since 2009 when petitioners' first requested the Secretary of Energy to suspend the fee when DOE terminated the nuclear waste program, and the lawfully imposed delay of three months before the suspension takes effect. The petitioners' further remarked that, every quarter, ratepayers are currently paying \$188 million in nuclear waste fees. The web link for the filing can be accessed by positioning the cursor over the underlined text and following the directions.
- 5. On December 4, the quarterly conference call of the Federal Energy Regulatory Commission rate case settlement briefed participants on spent fuel storage issues. The status update noted that the Court of Federal Claims issued its decision in the three Yankee companies (Maine Yankee, Connecticut Yankee, and Yankee Atomic) Phase II lawsuit against the federal government. The General Counsel reported that the Judge awarded the three Yankees over \$235 million with \$126.3 million going to Connecticut Yankee, \$73.3 million to Yankee Atomic, and \$35.7 million to Maine Yankee. Both parties have until January 14 to appeal the Judge's decision. The Phase III lawsuits were filed on August 15 to which the federal government responded on November 18. The Three Yankees were hopeful that the lawsuits would go to trial in 2014. Further updates included the Court of Appeals three decisions. The first being the directive to the NRC to resume the Yucca Mountain licensing process. The second was the Court's denial of Nevada's petition for rehearing to the full court on the resumption order. The third ruling directed the DOE to suspend the collection of annual fees for nuclear waste disposal from nuclear utilities. There was no congressional movement on nuclear waste reform legislation.
- 6. On December 5, Nye County, Nevada, the states of South Carolina and Washington, and Aiken County, South Carolina filed a motion with the D.C. Court of Appeals for a summary reversal of NRC Chairman Macfarlane's decision not to recuse herself in the Court ordered resumption of the Yucca Mountain licensing proceeding. The petitioners contended that her participation would violate their due process rights to a fair and impartial license hearing under the fifth amendment of the U.S. Constitution. The petitioners cited her public and published testimonies criticizing the Yucca Mountain project in 2006,

- 2009, and 2010 as their basis that she be disqualified. The web link for the filing can be accessed by positioning the cursor over the underlined text and following the directions.
- 7. On December 9, the NRC staff filed with the Commission a response to Nevada's petition for clarification and the Five Parties' (Nye County, Nevada, the states of South Carolina and Washington, Aiken County, South Carolina, and NARUC) motion for reconsideration of the Commission's November 18 Order for the resumption of the Yucca Mountain Licensing proceeding. The staff concluded that Nevada's request for clarification from the Staff Requirements Memorandum (SRM) was misplaced since the SRM is a tool for the Commission to provide direction to its staff outside the Commission's ruling. On the Five Parties motion the staff determined that there was no compelling reason to grant reconsideration since there was no indication of any errors that would invalidate the Commission's Order. The web link for the response can be accessed by positioning the cursor over the underlined text and following the directions.
- 8. On December 9, Nevada filed with the NRC its response to the Five Parties' (Nye County, Nevada, the states of South Carolina and Washington, Aiken County, South Carolina, and NARUC) request for leave to file a motion for reconsideration and their motion for reconsideration of the Commission's Yucca Mountain resumption Order. Nevada maintained that the request for leave was not warranted under NRC's regulations since the Five Parties can move for reconsideration without receiving prior permission to do so. Furthermore, Nevada contended that the Five Parties' motion for reconsideration should be denied since the motion was asking the Commission to grant certain relief that the Court denied. The web link for the filing can be accessed by positioning the cursor over the underlined text and following the directions.
- 9. December 9, the NRC Chair forwarded a letter to the Chair of the House Subcommittee on Energy and Power listing responses to thirteen questions posed by the House Subcommittee Chair in his November letter to the NRC on various agency activities and expenditures. The NRC's responses to the Yucca Mountain Project activities were captured in questions four through six. The three questions focused on anticipated release dates for the Yucca Mountain Safety Evaluation Reports, the resources necessary to issue a final decision on the Yucca Mountain repository, and whether the Commission will request additional funds to complete the licensing process. The web link for the <u>letter</u> and <u>three questions</u> can be accessed by positioning the cursor over the underlined text and following the directions.
- 10. On December 9, the Five Parties' filed with the NRC its response to Nevada's petition clarification of the restart Order and Staff Requirements Memorandum (SRM). The Five Parties concluded that there was nothing in the SRM that would circumvent NRC rules while finalizing the Safety Evaluation Reports. Nevada maintained that work was not considered complete unless it had received staff management and Office of General Counsel review. The Five Parties viewed this assertion as restricting the staff to adopting only previous technical work that had received such a review and advocated for the Commission to reject any such restrictions. The web link for the response can be accessed by positioning the cursor over the underlined text and following the directions.
- 11. On December 10, the House Committee on Energy and Commerce issued a memorandum in preparation for a December 12 hearing on oversight of NRC management. The focus of the hearing would be on the recent Court's Order to resume the Yucca Mountain licensing proceeding, the efficient uses of resources, and legislative reform of the Commission's authorities. The memorandum provided a historical background on the NRC's formulation and governance authority, a summary of the proposed legislation to reform the Commission's authorities in light of the previous Chair's Yucca Mountain and Fukushima actions and leadership style, and Yucca Mountain related issues. The web link for the memorandum can be accessed by positioning the cursor over the underlined text and following the directions.

- 12. On December 11, the NRC Chair sent identical letters to the House of Representatives and the Senate stating the agencies activities in response to the Court ordered mandate to resume the Yucca Mountain licensing review. The Chair mentioned the Commission Order for all parties in the Yucca Mountain licensing proceeding to comment on how the NRC should move forward with the Court Order, the staffs' updated cost estimates for the licensing process, and the subsequent Commission Order directing the staff to resume the licensing proceeding and requested the DOE to complete their supplemental environmental impact statement. The web link for the letter can be accessed by positioning the cursor over the underlined text and following the directions.
- 13. On December 11, the DOE's Office of Inspector General issued an audit report on DOE's management of the NWF for Fiscal Year 2013. The independent certified public accountants' review concluded that there were no deficiencies or instances of noncompliance warranting a disclosure and that the financial statements presented fairly the financial positions of the Fund for the years ending on September 30 of 2012 and 2013. According to the report the NWF has a balance of \$34.1 billion as of the end of September 2013 with interest on the account accruing at over \$1.3 billion per year. The web link for the report can be accessed by positioning the cursor over the underlined text and following the directions.
- 14. On December 11, the Chair of the House Committee on Energy and Commerce and the Chair of the Subcommittee on Environment and the Economy forwarded a letter to Energy Secretary Moniz requesting that he respond to several questions and requests for information governing the DOE's actions since the D.C. Circuit's rulings to mandate the resumption of the Yucca Mountain Licensing process and the Nuclear Waste Fund fee suspension, and the NRC's Order for the DOE to complete its supplemental environmental impact statement (EIS) on groundwater impacts. The questions centered on DOE's actions to fulfill the fee suspension, whether the DOE will comply with the Nuclear Waste Policy Act and the NRC's Order on the supplemental EIS, DOE expenditures from the Nuclear Waste Fund, and why the DOE ceased providing monthly reports on the status of the Nuclear Waste Fund collections since 2010. The Chairs also requested DOE's supporting information relative to their responses to the questions with plans, schedules, and estimates. The web link for the letter can be accessed by positioning the cursor over the underlined text and following the directions.
- 15. On December 12, the House Committee on Energy and Commerce held a hearing on "Oversight of NRC Management and the Need for Legislative Reform". Testimony was provided by the NRC Chair with all the Commissioners in attendance. Chairman Macfarlane's testimony covered such topics as the current operating reactors, new construction, decommissioning, Yucca Mountain, waste confidence, Fukushima, security, international, sequestration and government shutdown, internal Commission procedures, and a look ahead. Nearly half of her testimony centered on Fukushima. On Yucca Mountain she described what activities the Commission took in response to the Court's resumption Order and the NRC's follow-on Order for resuming Yucca Mountain licensing activities. The Chair also stated the Commission would provide monthly status reports on their Court Ordered mandate. The web link for the testimony can be accessed by positioning the cursor over the underlined text and following the directions.
- 16. On December 13, DOE filed with the D.C. Court of Appeals their opposition to the petitioners' (Nye County, Nevada, the states of South Carolina and Washington, Aiken County, South Carolina, and NARUC) motion for expedited issuance of the Court's mandate to suspend the Nuclear Waste Fund fee collection. DOE challenged the petitioners' claim of a financial impact as justification for the Court to issue its mandate and contended that such an edict would compromise due process and circumvent the Court's long standing procedures and precedent. Consequently, DOE requested that the petitioners' motion be denied. The web link for the filing can be accessed by positioning the cursor over the underlined text and following the directions.

- 17. On December 13, the DOE filed with the D.C. Court of Appeals its reply to their initial motion for a 31 day extension to request the full Court's rehearing on their Order for DOE to propose to Congress to lower the Nuclear Waste Fund (NWF) fee to zero. The filing was in response to the petitioners' (Nye County, Nevada, the states of South Carolina and Washington, Aiken County, South Carolina, and NARUC) opposition to DOE's extension request. DOE objected to the petitioners' characterization of their request as a tactic to delay compliance with the Court's Order and provided reasons for good cause for the Court to grant the extension. The web link for the reply can be accessed by positioning the cursor over the underlined text and following the directions.
- 18. On December 17, the petitioners' (Nye County, Nevada, the states of South Carolina and Washington, Aiken County, South Carolina, and NARUC) filed with the D.C. Circuit their reply in support of their motion for expedited issuance of the mandate for DOE to lower the NWF fee to zero. The petitioners' presented several Court cases where mandates were expeditiously issued based on financial impacts. The web link for the <u>reply</u> can be accessed by positioning the cursor over the underlined text and following the directions.
- 19. On December 18, NRC Chair Macfarlane forwarded NRC's monthly status report to the Chair of the House Committee on Energy and Commerce on their activities and expenditures that impacted the Nuclear Waste Fund. Activities included the on-going legal advice to the Commission and the Commission Order on the resumption of the Yucca Mountain licensing proceeding, which included direction to the staff and request for DOE to furnish its supplemental environmental impact statement. The NRC activities resulted in \$6,821 in expenditures, which left \$10.9 million of unobligated funds for the licensing process. The web link for the letter and report can be accessed by positioning the cursor over the underlined text and following the directions.
- 20. On December 20, the Nuclear Waste Strategy Coalition (NWSC) submitted a letter to the NRC praising the Waste Confidence Directorate's public outreach efforts on their successful nationwide meetings and stakeholder involvement. However, the NWSC expressed concern that the NRC's inordinate use of extended storage scenarios for bounding the impacts in the draft generic environmental impact statement may become policy. The NWSC emphasized their support for the federal government to abide by the Nuclear Waste Policy Act and seek congressional funding to complete the Yucca Mountain licensing review. Such actions would provide assurance to the public that the federal government would uphold their obligation. The NWSC is an ad hoc organization of state utility regulators, consumer advocates, tribal governments, local governments, electric utilities, and other government and industry experts on nuclear waste policy matters. The web link for the letter can be accessed by positioning the cursor over the underlined text and following the directions.
- 21. On December 20, the U.S. Court of Appeals for the D.C. Circuit issued an Order denying the DOE's petition for a 31 day extension to allow DOE time to request a rehearing of the Court's November 19th Order to forward to Congress a reduction in the NWF fee to zero. In addition, the Court further ordered the petitioners' motion for expedited issuance be granted and directed the Clerk of the Court to do so immediately. The web link for the Order can be accessed by positioning the cursor over the underlined text and following the directions.
- 22. On December 20, the Decommissioning Plant Coalition (DPC) sent a letter to the NRC commenting on their Waste Confidence Ruling and Generic Environmental Impact Statement (GEIS). The DPC expressed concern that the NRC may unintentionally endorse indefinite on-site storage of spent nuclear fuel as public policy. They noted that the federal government's continued default on its responsibilities has raised the specter of relying on extended on-site storage as a means of achieving waste confidence. The DPC proposed some comments that would clarify some of the statements in the draft GEIS on100 years as a reasonable timeframe for the need of dry transfer systems and replacement of ISFSI casks and

concrete pads. The web link for the <u>letter</u> can be accessed by positioning the cursor over the underlined text and following the directions.

23. In December, the DOE's Office of Used Nuclear Fuel Disposition issued a report, entitled "Preliminary Report on Dual-Purpose Canister Disposal Alternatives (FY '13)". The 190 page report documented the first phase of a multi-year effort to recognize the technical feasibility and logistics for the direct disposal of dual-purpose canisters and other types of storage canisters. Disposal concepts included salt formations, crystalline (hard) rock and sedimentary media such as clay or shale. Backfilling presented thermal management concerns for hard and sedimentary rocks as waste package temperatures increased significantly. Although the salt concept was not hindered by the immediate backfill of the canisters, the hard and sedimentary rocks would require ventilation for probably longer than 50 years to remove the decay heat of the used fuel to meet the peak host rock temperature of 180 degrees. The preliminary analyses indicated that direct disposal could be technically feasible but further research was necessary to narrow the range of disposal concepts to be evaluated. The web link for the report can be accessed by positioning the cursor over the underlined text and following the directions.