



97-0001526

Department of Energy

Washington, DC 20585

May 1, 1997

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DNF SAFETY BOARD

The Honorable John T. Conway
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue, NW
Suite 700
Washington, D.C. 20004

Dear Mr. Chairman:

Enclosed is the quarterly progress report on implementation of Defense Nuclear Facilities Safety Board Recommendation 94-2 for the period from January 1, 1997, to March 31, 1997.

The report shows that the Department has continued to make good progress in implementing the task initiatives to which it has committed. The body of the progress report contains a status table on the task initiatives that were due during the current reporting period. A status table on all of the task initiatives is included as an appendix.

Sincerely,

A handwritten signature in cursive script that reads "Alvin L. Alm".

Alvin L. Alm
Assistant Secretary for
Environmental Management

Enclosure

cc: Mark Whitaker, S-3.1

Quarterly Report
for
Implementation Plan
Defense Nuclear Facilities Safety Board
Recommendation 94-2

**Conformance with Safety Standards at
Department of Energy
Low-Level Nuclear Waste and Disposal Sites**

January 1 through March 31, 1997

**Quarterly Report for
Implementation Plan
Defense Nuclear Facilities Safety Board
Recommendation 94-2**

1.0 INTRODUCTION

The Department of Energy (DOE) issued the "Implementation Plan (IP), Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 94-2" in March 1995. In May 1996 DOE issued a revision to the IP that reflected enhancements to DOE's approaches to the systems engineering and the radiological assessments, and better integration and coordination of both the task initiatives and the involved organizations. In August 1996, the Department received a letter from the DNFSB accepting the revised IP, with conditions.

The revised IP follows the same general approach as the original IP, identifying initiatives in six task areas:

- Systems Engineering
- Complex-Wide Review
- Regulatory Structure and Process
- Radiological Assessments
- Low-Level Waste Projections
- Research and Development

This is the sixth report on the status of task initiatives as described in the IP that DOE is undertaking to improve its management of low-level waste (LLW). This report covers the period from January 1, 1997, to March 31, 1997.

2.0 OVERVIEW

2.1 General Progress

During this reporting period DOE completed two actions that represent the culmination of a number of supporting efforts in meeting DNFSB 94-2 Implementation Plan commitments. In the Systems Engineering task area, the final product, a *Low-Level Waste Program Management Plan*, was completed. This Plan builds on the previous systems engineering work that was done for low-level waste management. In the Regulatory Structure and Process task area, a draft Order, Manual, and implementing Guides were prepared to address the regulation of radioactive waste management. The Order, Manual, and Guides pull together other deliverables that have been developed to provide interim improvements to the regulation of DOE low-level waste. Taken together, the Order, Manual, and guidance address the essential requirements for low-level waste management, institutionalize the requirements for preparing a composite analysis centered around a disposal facility, formalize the process for review

and approval of performance assessments and composite analyses, and provide critical assumptions and guidance for the preparation and review of performance assessments.

In the Radiological Assessments task area, the review of the Hanford 200 East Area burial grounds performance assessment was initiated. In addition, the Los Alamos National Laboratory completed, and the Albuquerque Operations Office submitted for review, a combination performance assessment and composite analysis. With this document, the Albuquerque Operations Office met its schedule for submitting a performance assessment for the Los Alamos National Laboratory Material Disposal Area G, and beat the December 1997 schedule for submitting the composite analysis.

Also, the Research and Development tasks which had been deferred pending completion of other tasks were resumed during this reporting period. Through working with representatives from the various DOE sites, an initial low-level waste research and development needs statement has been developed. Further work will refine and prioritize the needs.

2.2 Meetings with the DNFSB and Staff

2.2.1 Meetings During this Reporting Period

In this reporting period there were no scheduled face-to-face meetings between DOE staff and staff from the DNFSB. All interactions specifically regarding DNFSB Recommendation 94-2 were held via telephone conferences.

2.2.2 Meetings in Future Reporting Periods

The following interactions with the DNFSB or staff are anticipated during the next reporting period:

DOE anticipates meeting with the DNFSB staff to discuss the draft DOE Order 435.1, *Radioactive Waste Management*, which has been distributed for review.

3.0 SUMMARY OF COMMITMENTS DUE IN THE CURRENT REPORTING PERIOD

The following table summarizes the status of commitments that were due to be completed during the current reporting period. Appendix A provides a listing of all task initiatives committed to in the 94-2 Implementation Plan and their status, as reported in DOE's Safety Issues Management System (SIMS). Two indicators are provided in the first column of the following table. The first correlates with the commitment as numbered in the Implementation Plan. The second number corresponds to the numbering system used in SIMS.

Status of Task Initiatives Due January 1, 1997 - March 31, 1997

IP Task # SIMS ID #	Title or Description	Due Date	Status
<u>IV.B.5</u> R94-02 007	Low-Level Waste Program Management Plan	03/31/97	Completed. A program management plan for low-level waste was submitted to the DNFSB on March 31, 1997.
<u>VI.B.5</u> R94-02 021	Identify Essential Requirements for Managing Low-Level Waste	02/28/97	Completed. Essential requirements for low-level waste management were included in the draft DOE O 435.1 and DOE M 435.1 which were submitted to the DNFSB on February 28, 1997.
<u>VI.B.6</u> R94-02 022	Develop Implementation Guidance for Managing Low-Level Waste	02/28/97	Completed. Draft guidance documents DOE G 435.1-5, 435.1-6, and 435.1-7 were submitted to the DNFSB with the Order and manual on February 28, 1997.
<u>VI.B.7</u> R94-02 023	Improve Radiological Assessment Review and Approval Process	02/28/97	Completed. The requirements and responsibilities for review and approval of radiological assessments are addressed in the draft DOE M 435.1 submitted to the DNFSB on February 28, 1997.

Status of Task Initiatives Due January 1, 1997 - March 31, 1997

IP Task # SIMS ID #	Title or Description	Due Date	Status
VII.B.1 R94-02 024	Issue Performance Assessment Critical Assumptions	01/31/97	Completed. Delayed per Letter to DNFSB on February 2, 1997. The critical assumptions were transmitted to the DNFSB on March 7, 1997.
VII.B.4.b.2 R94-02 028	Publish PA Format and Content, and Standard Review Plan Documents	01/31/97	Completed. Interim guidance document for preparing and reviewing PAs was transmitted to the DNFSB on November 1, 1996.
VII.B.5.b.1' R94-02 029-001	Submit Los Alamos Material Disposal Area G Performance Assessment to Headquarters for Review	03/31/97	Completed. The performance assessment was transmitted to Headquarters on March 31, 1997; DNFSB was notified by letter on April 3, 1997.
IX.B.2 R94-02 037	Issue Low-Level Waste Research and Development Needs Statement	03/31/97	Completed. The LLW R&D needs statement was transmitted to the DNFSB on April 18, 1997.

¹Completion of this item only partially completes the full commitment in the IP which involves not only the performance assessment, but the composite analysis and the disposal authorization statement.

4.0 TASK AREA STATUS

4.1 Systems Engineering

During this reporting period, work in this task area was focused on the preparation, review, and finalization of the *Low-Level Waste Program Management Plan*. A draft *Low-Level Waste Program Management Plan* was prepared and distributed for review by the field organizations and the Headquarters organizations with responsibility for waste generating or management activities. The Low-Level Waste Management Steering Committee members held a meeting from February 24 through 28, 1997 at which they discussed their comments on the Plan and developed proposals for revising it. The final Plan was completed on March 31.

The Plan outlines the programmatic strategies, policy initiatives and assumptions that are the basis for evolving to an integrated low-level waste program. The implementing principles and goals in the *Low-Level Waste Program Management Plan* are the same as those for low-level waste developed for the Office of Environmental Management Ten-Year Plan. The *Low-Level Waste Program Management Plan* identifies organizational structure, key management interfaces, and roles and responsibilities, including those of the newly-formed Low-Level Waste Center of Excellence centered at the Idaho Operations Office. Further, the Plan describes near-term and longer-term actions and milestones for moving the program forward. The Department intends to revise the plan as necessary to provide the top-level direction for DOE in low-level waste management.

4.2 Complex-Wide Review

The Final Complex-Wide Review (CWR) Report was transmitted to the DNFSB on May 17, 1996. This completed all CWR task initiatives. DOE-wide and site-specific corrective actions in response to the CWR were completed as part of the Systems Engineering task initiative.

4.3 Regulatory Structure and Process

In conjunction with the DOE Order 5820.2A, *Radioactive Waste Management*, revision effort, the Order revision low-level waste team completed draft documents addressing requirements for the Department's management of low-level waste. The draft order, DOE O 435.1, *Radioactive Waste Management*, includes overarching requirements for managing radioactive waste to protect the public, workers, and the environment, and to comply with applicable laws, regulations, and DOE directives. The essential requirements for safe management of low-level waste are included in the draft manual, DOE M 435.1, which complements the Order. Additionally, the team compiled an initial set of guidance documents for implementing the requirements. The draft guidance documents include a number of products previously prepared as part of the implementation of DNFSB Recommendation 94-2 (e.g., performance assessment

guidance documents, policy on management of waste generated as part of a cleanup activity), portions of existing guidance documents, and newly-developed material. In completing the Order, Manual, and Guides, DOE has addressed commitments made in the DNFSB 94-2 Implementation Plan, Revision I. These include the commitments to identify essential requirements for low-level waste management, to develop implementing guidance for the requirements, and to formalize the process for review and approval of performance assessments. The draft Order, Manual, and Guides were completed on February 28, 1997.

In addition to the documents discussed above, DOE developed a combination crosswalk and technical justification document in support of the Order revision. The crosswalk tracks how each requirement in the existing DOE Order 5820.2A is addressed in the draft revision. For those requirements from Order 5820.2A that are not included in the revision, a technical justification for its omission is provided. The technical justification provided also discusses other factors, such as the safety and hazards analysis and the requirements analysis that are the basis for including requirements in the draft revised Order. All of the documents have been distributed within DOE and to the DNFSB for a 60-day review period.

During the first half of the next reporting period, the review of the draft Order, Manual, Guides, and technical justification will continue. Comments received from the review will then be evaluated and the necessary modifications to the documents will be made. A workshop of the Order revision teams is scheduled for May, at which time proposed changes will be discussed within the low-level waste team and among the teams responsible for the different chapters. The current target for completion of the revised Order and Manual is the end of September 1997.

4.4 Radiological Assessments

During the current reporting period, the Department completed two commitments in the Radiological Assessments task area. The Albuquerque Operations Office submitted the *Performance Assessment and Composite Analysis for Los Alamos National Laboratory Material Disposal Area G* (LA-UR-97-85) to Headquarters on March 31, 1997. This document evaluates projected performance of the Materials Disposal Area G for compliance with the DOE Order 5820.2A radiological performance objectives and includes a composite analysis of the projected offsite impact of the disposal area combined with other radiological sources on site. By including the composite analysis for the Material Disposal Area G in this document, the Albuquerque Operations Office has completed its December 1997 commitment to prepare a composite analysis well ahead of schedule.

The second commitment completed during this period was the documentation of "critical assumptions" affecting performance assessments. These are largely policy issues that are being established to achieve consistency in how certain issues are addressed at the different DOE sites preparing performance assessments. They include an assumption that DOE will control the land on which low-level waste is disposed unless and until the land can be released

from radiological controls in accordance with DOE Order 5400.5, *Radiological Protection of the Public and the Environment*, a 1000 year time of compliance for providing a reasonable expectation of meeting the performance objectives, a requirement to conduct analyses to reveal the peak dose, and direction on the location at which compliance should be evaluated. Issuance of these critical assumptions was delayed beyond the due date of January 31 to March 7 to ensure that they were coordinated and consistent with the draft Order and Manual.

Another commitment due during this reporting period was previously reported as being completed. The *Interim Format and Content Guide, and Standard Review Plan for U.S. Department of Energy Low-Level Waste Disposal Facility Performance Assessments* was distributed in November. As with the critical assumptions addressed in the preceding paragraph, this document will become part of the documentation associated with the revised Order.

The Department proceeded with establishing a DOE-staffed group that has responsibility for reviewing and recommending approval of performance assessments and composite analyses (PA/CA Review Group). The group is made up of representatives from the Headquarters Offices of Waste Management (EM-30), Environmental Restoration (EM-40), and Environmental Guidance (EH-4) and representatives from field organizations. The members of the group held an organizational conference call during this reporting period. The group decided that the existing Peer Review Panel (composed of contractor technical staff) should proceed with the review of the Hanford 200 East Area performance assessment and report the results of its review to the PA/CA Review Group. The PA/CA Review Group is scheduled to convene a kickoff meeting during the next reporting period.

Upon direction from the EM-30 co-chair of the PA/CA Review Group, the Peer Review Panel initiated its technical review of the Hanford 200 East Area burial grounds performance assessment. The Panel held a meeting on March 18 and 19 to discuss the completeness and technical quality of the performance assessment. As a result of the meeting, the Richland Operations Office has been requested to provide supplemental information to the Panel. During the next reporting period, it is expected that the Richland Operations Office will provide the requested information, the Peer Review Panel will complete its review, and, with input from the PA/CA Review Group, Headquarters will make a determination on the acceptability of the performance assessment. The Headquarters action, which is an April 30, 1997, commitment in the DNFSB 94-2 Implementation Plan, will be delayed beyond the due date, but will be completed during the reporting period.

4.5 Low-Level Waste Projections

During the next reporting period, data are to be collected from the sites and compiled to support the development of disposal capacity analysis which considers the radiological constraints at the DOE sites. Previously, DOE completed a disposal capacity analysis based only on volume of the waste. The

analysis of low-level waste disposal capacity, including radiological capacity, is a deliverable due in September 1997.

4.6 Research and Development

During this reporting period, the Low-Level Waste Center of Excellence assumed responsibility for the Research and Development task area of the DNFSB Recommendation 94-2 Implementation Plan. The first activity undertaken was a revision of the preliminary cataloging of low-level waste management-related research and development that was completed in June 1995. Subsequently, a report on low-level waste management research and development needs was developed with cooperation and input from the DOE Site Technology Coordination Groups. These groups are composed of DOE site representatives who serve as the focal point for waste management and environmental restoration technology needs at the sites. This report represents a compilation of needs identified by the sites.

During the next reporting period, the needs identified by the sites will be evaluated and compared to existing and ongoing research and development activities. The purpose of the evaluation is to determine which of the identified needs are outstanding and which are or have been addressed by work done elsewhere. Part of this evaluation will include a review by the Site Technology Coordination Groups as well as site Low-Level Waste Management Program personnel to ensure that identified research and development needs that are or have been previously addressed are not carried forward as work that remains to be done. The research and development needs that remain following this evaluation will be documented during the next reporting period as the needs to be addressed by the Department in support of low-level waste management. These remaining needs will be the input to the strategy for low-level waste research and development that is due by the end of the fiscal year.

Appendix

**Safety Issues Management System
Report for Recommendation 94-2
January 1, 1997 to March 31, 1997**

Safety Issues Management System

Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low -Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
R94-02	001		The Project Management Plan (PjMP) will be updated to manage the task initiatives and commitments described in this Implementation Plan.	Updated Project Management Plan (PjMP).	IP dated 4/96, Commitment III.C.1, pg. III-9	Complete 6/27/96		06/30/1996
R94-02	002		The Low-Level Waste Management Task Group (LLWMTG) will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Reports.	IP dated 4/96, Commitment III.C.2, pg. III-10	Open		Periodic - Quarterly, 30 days after the end of each calendar year quarter.
R94-02	002	001	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (April-June 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/29/96	Quarterly Report for period of April through June 1996 delivered 7/29/96.	07/31/1996
R94-02	002	002	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (July-September 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 11/1/96		10/31/1996
R94-02	002	003	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (October-December 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 2/7/97	Ref: EM97-00433	01/31/1997
R94-02	002	004	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report. (January - March 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Open		04/30/1997
R94-02	003		The Department will complete and document a systems engineering evaluation to accomplish the mission of the LLW program.	DOE LLW management system engineering evaluation report.	IP dated 4/96, Commitment IV.B.1, pg. IV-3	Complete 6/30/95		06/30/1995
R94-02	004		The Department will compile and document LLW program system requirements including goals and assumptions.	LLW program requirements document.	IP dated 4/96, Commitment IV.B.2, pg. IV-3	Complete 4/26/96		04/30/1996
R94-02	005		The Department will analyze the requirements to determine what functions (activities) are necessary to accomplish the requirements and identify any additional requirements and functions needed to integrate the program.	LLW system description document.	IP dated 4/96, Commitment IV.B.3, pg. IV-4	Complete 10/7/96	Deliverable letter of 10/7/96 for the SDD states intent to update the SDD once the Waste Management Order is revised.	09/30/1996
R94-02	006		A study will be performed to evaluate the safety merits and demerits of using a privately operated facility away from DOE sites for the exclusive disposal of DOE LLW.	Privatization guidelines.	IP dated 4/96, Commitment IV.B.4, pg. IV-4	Complete 10/2/96		09/30/1996

Safety Issues Management System
Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low -Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
R94-02	007		The Department will prepare and maintain a Program Management Plan.	LLW Program Management Plan.	IP dated 4/96, Commitment IV.B.5, pg. IV-5	Complete 3/31/97	The PMP includes the guidance and criteria for sites to use when considering disposal options which was specified as part of Task IV.B.4.	03/31/1997
R94-02	008		A complex-wide corrective action plan will be prepared to correct the vulnerabilities common across the complex.	Initial complex-wide corrective action plan.	IP dated 4/96, Commitment IV.B.6.b.1, pg. IV-6	Complete 7/31/96		07/31/1996
R94-02	009		Site-specific corrective action plans prepared as a result of the Complex-Wide Review constitute the initial site improvement activities.	Initial site-specific corrective action plans.	IP dated 4/96, Commitment IV.B.6.b.2, pg. IV-6	Complete 7/31/96		07/31/1996
R94-02	010		The Assessment Working Group members are selected to develop the complex-wide review process. The Assessment Working Group identifies and selects the Working Group Assessment Teams to perform evaluations of the 38 facilities.	Individuals to staff the Assessment Working Group and Working Group Assessment Teams are assigned.	IP dated 4/96, Commitment V.B.1, pg. V-12	Complete 3/4/96	Complete membership delivered to the Board in an EM-30 letter dated 3/4/96.	02/29/1996
R94-02	011		LLW sites to be surveyed are identified and a survey instrument is prepared. Individuals are trained on survey contents and survey methods, and perform surveys at their sites, beginning June 1, 1995.	Completed site surveys.	IP dated 4/96, Commitment V.B.2, pg. V-12	Complete 11/30/95		11/30/1995
R94-02	012		Independent evaluations are completed for the 38 facilities and an assessment report for these sites is issued.	Preliminary Report.	IP dated 4/96, Commitment V.B.3, pg. V-12	Complete 4/12/96		04/12/1996
R94-02	013		Independent evaluations are completed for the 38 facilities and an assessment report for these sites is issued.	Final Report.	IP dated 4/96, Commitment V.B.3, pg. V-12	Complete 5/17/96	CWR results were briefed to the Board on 4/16/96.	05/17/1996
R94-02	014		Issue an Office of Waste Management Directive on inclusion of pre-1988 waste and consideration of other sources of radioactive contamination.	Office of Waste Management Directive.	IP dated 4/96, Commitment VI.B.1, pg. VI-5	Complete 5/31/95		05/31/1995
R94-02	015		Issue an interim policy improving the regulatory structure and process for LLW disposal facility performance assessments in a memorandum entitled, "Interim Policy on Regulatory Structure for Low-Level Radioactive Waste Management and Disposal."	Interim Policy Statement.	IP dated 4/96, Commitment VI.B.2.b.1, pg. VI-6	Complete 7/21/95	Interim Policy will be prepared by the Low-Level Waste Management Task Group and issued jointly by EM and EH.	07/21/1995
R94-02	016		A revision to the interim policy will be issued that clarifies the first policy on regulatory structure for LLW management and the policy to include pre-1988 LLW in performance assessments.	Revised interim policy statement.	IP dated 4/96, Commitment VI.B.2.b.2, pg. VI-6	Complete 7/31/96		07/31/1996

Safety Issues Management System
Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low-Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
R94-02	017		Recognizing that CERCLA disposal and storage sites are also regulated by EPA and in some cases the states, a policy and guidance document will be developed to identify the applicable low-level waste requirements for such activities and specify actions necessary to demonstrate protection of human health consistent with the requirements of Order 5820.2A.	Policy and guidance document issued for CERCLA sites.	IP dated 4/96, Commitment VI.B.3.b.1, pg. VI-7	Complete 5/31/96	Discussed in meeting with Board Staff on 5/3/96.	05/31/1996
R94-02	018		Recognizing that RCRA disposal and storage sites are also regulated by EPA and in some cases the states, a policy and guidance document will be developed to identify the applicable low-level waste requirements for such activities and specify actions necessary to demonstrate protection of human health consistent with the requirements of Order 5820.2A.	Policy and guidance issued for RCRA sites.	IP dated 4/96, Commitment VI.B.3.b.2, pg. VI-7	Complete 1/9/97		12/31/1996
R94-02	019		Complete a report comparing 10 CFR 61 and Agreement State requirements plus license conditions and waste acceptance criteria with those of the Department.	Report comparing DOE and non-DOE requirements and standards.	IP dated 4/96, Commitment VI.B.4.b.1, pg. VI-8	Complete 12/29/95		12/29/1995
R94-02	020		International efforts such as the IAEA RADWASS program are being considered, along with information specific to the LLW management programs in Canada, the United Kingdom, France, and Sweden, in a report.	Report comparing DOE and international requirements and standards.	IP dated 4/96, Commitment VI.B.4.b.2, pg. VI-8	Complete 6/11/96	Report submitted to DNFSB 19 days early.	06/30/1996
R94-02	021		The Department will undertake a process to identify essential requirements to be included in the Low Level Waste Chapter of the revised Order on Radioactive Waste Management. A major component of the process will be the development and documentation of the bases for any essential requirements to be incorporated into the Order revision.	Report identifying essential Low-Level Waste Management requirements.	IP dated 4/96, Commitment VI.B.5, pg. VI-8	Complete 2/28/97	Requirements are identified in draft Order 435.1 documents which were sent to the Board on 2/28/97.	02/28/1997
R94-02	022		As part of the identification and development of requirements for LLW management, implementation guidance will be developed, and necessary documentation will be provided in time to support the Radioactive Waste Management Order revision.	Implementation guidance and technical standards to support essential LLW management requirements.	IP dated 4/96, Commitment VI.B.6, pg. VI-10	Complete 2/28/97	Implementation guidance delivered to the Board with draft Order 435.1 on 2/28/97.	02/28/1997
R94-02	023		The approval process for radiological assessments (i.e., performance assessments and composite analyses) will be formalized in order to make the process consistent with the commitments made in this Implementation Plan and will become part of the Order revision for Radioactive Waste Management.	Radiological assessment approval process modified and formally developed for inclusion in Radioactive Waste Management Order revision.	IP dated 4/96, Commitment VI.B.7, pg. VI-10	Complete 2/28/97	Included with draft Order 435.1 documents which were delivered to the Board on 2/28/97.	02/28/1997
R94-02	024		The Department will issue interim direction addressing the critical aspects of conducting a performance assessment.	Policies addressing critical assumptions and clarifications for performance assessments.	IP dated 4/96, Commitment VII.B.1, pg. VII-5	Complete	Deliverable sent to the Board on 3/7/97 (Ref: EM97-0832). This deliverable was deferred until the end of February consistent with the Order	01/31/1997

Safety Issues Management System
Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low -Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
						3/7/97	revision effort. A letter to the Board informing them of the deferred delivery was sent on 2/2/97. Ref: EM96-04920.	
R94-02	025		DOE will prepare and provide to the sites a document providing guidance on the preparation of the composite analyses.	Guidance for conducting composite analyses.	IP dated 4/96, Commitment VII.B.2, pg. VII-6	Complete		05/31/1996
R94-02	026		DOE will prepare a documented description of the process for Headquarter's review of the composite analyses and the criteria for evaluating the acceptability of the analyses.	Description of the process and criteria for Headquarter's review of composite analyses.	IP dated 4/96, Commitment VII.B.3, pg. VII-7	Complete		10/31/1996
R94-02	027		The guidance on performance assessment maintenance program will specify criteria for periodic review of the performance assessments to ensure that the waste acceptance criteria and design and operational requirements derived from the performance assessments remain viable, as well as provide criteria for determining when revisions to the performance assessments are necessary.	PA maintenance guidance document.	IP dated 4/96, Commitment VII.B.4.b.1, pg. VII-8	Complete		09/30/1996
R94-02	028		The guidance on performance assessment format and content will provide an annotated outline of the matters to be addressed in a performance assessment, including incorporation of performance assessment results into waste acceptance criteria. The Standard Review Plan will include technical criteria for the findings that must be made to determine that a performance assessment is technically acceptable.	PA format and content, and standard review plan documents.	IP dated 4/96, Commitment VII.B.4.b.2, pg. VII-8	Complete	In response to the Board's IP revision acceptance condition, completed this deliverable early.	01/31/1997
R94-02	029		Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Submit performance assessment to Headquarters for review; complete the Headquarters technical review and documentation.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open	The last PA reviewed by November 30, 1998.	11/30/1998
R94-02	029	001	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Submit LANL TA-54, Area G, performance assessment to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		03/31/1997
R94-02	029	002	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the LANL TA-54, Area G, performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open	Deliverable prepared. Expected to be sent to the Board by April 4, 1997.	12/31/1997
R94-02	029	003	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance	Complete the Headquarters technical review and	IP dated 4/96, Commitment	Complete	PRP recommended approval at July meeting. PA accepted	08/31/1996

Safety Issues Management System

Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low -Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letoumeau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
			with the requirements of the Order.	documentation of the INEL Radioactive Waste Management Complex performance assessment.	VII.B.5.b.1, pg. VII-9	8/30/96	with conditions.	
R94-02	029	004	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the NTS Area 5 Radioactive Waste Management Site performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete	PA accepted with conditions.	08/31/1996
R94-02	029	005	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Submit NTS Area 3 Radioactive Waste Management Site performance assessment (including composite analysis) to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		03/31/1998
R94-02	029	006	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the NTS Area 3 Radioactive Waste Management Site performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		11/30/1998
R94-02	029	007	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Submit ORNL Solid Waste Storage Area-6 performance assessment to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		09/30/1997
R94-02	029	008	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the ORNL Solid Waste Storage Area-6 performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		01/21/1998
R94-02	029	009	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the Hanford 200-W Burial Ground performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete		06/30/1996
R94-02	029	010	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Submit the Hanford 200-E Burial Ground performance assessment to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete	Under HQ review at this time.	08/31/1996
R94-02	029	011	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the Hanford	IP dated 4/96, Commitment VII.B.5.b.1, pg.	Open	Under HQ review at this time.	04/30/1997

Safety Issues Management System
Summary Recommendation Report - Key Commitment and Action Information

Recommendation # R94-02 Conformance with Safety Standards at Low -Level Nuclear Waste Disposal Sites

Resp. Org. EM

Resp. Mgr. Mr. Martin Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
				200-E Burial Ground performance assessment.	VII-9			
R94-02	029	012	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	Complete the Headquarters technical review and documentation of the SRS Saltstone Disposal Facility performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete	PA found technically acceptable except for groundwater analysis - more analysis is being requested. Formal closure with the Board will be proposed when the additional groundwater analysis information is received and reviewed.	07/31/1996
R94-02	030		The sites will prepare a composite analysis.	Submit composite analyses to Headquarters for review; complete the Headquarters technical review and documentation.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open	The last composite analysis reviewed by December 31, 1999.	12/31/1999
R94-02	030	001	The sites will prepare a composite analysis.	Submit LANL TA-54, Area G, composite analyses to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open	<i>See status of R94-02 029 001.</i>	12/31/1997
R94-02	030	002	The sites will prepare a composite analysis.	Complete the Headquarters technical review and documentation of the LANL TA-54, Area G, composite analyses.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		03/31/1998
R94-02	030	003	The sites will prepare a composite analysis.	Submit INEL Radioactive Waste Management Complex composite analyses to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		01/31/1998
R94-02	030	004	The sites will prepare a composite analysis.	Complete the Headquarters technical review and documentation of the INEL Radioactive Waste Management Complex composite analyses.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		04/30/1998
R94-02	030	005	The sites will prepare a composite analysis.	Submit the NTS Area 5 Radioactive Waste Management Site composite analyses to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		09/30/1999
R94-02	030	006	The sites will prepare a composite analysis.	Complete the Headquarters technical review and	IP dated 4/96, Commitment	Open		12/31/1999

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				documentation of the NTS Area 5 Radioactive Waste Management Site composite analyses.	VII.B.5.b.2, pg. VII-9			
R94-02	030	007	The sites will prepare a composite analysis.	Submit the ORNL Solid Waste Storage Area-6 composite analyses to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		09/30/1997
R94-02	030	008	The sites will prepare a composite analysis.	Complete the Headquarters technical review and documentation of the ORNL Solid Waste Storage Area-6 composite analyses.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		12/31/1997
R94-02	030	009	The sites will prepare a composite analysis.	Submit the Hanford 200-E & W Burial Grounds & Environmental Restoration Disposal Facility composite analysis to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		12/31/1997
R94-02	030	010	The sites will prepare a composite analysis.	Complete the Headquarters technical review and documentation of the Hanford 200-E & W Burial Grounds & Env. Rest. Disp. Fac. composite analysis.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		05/31/1998
R94-02	030	011	The sites will prepare a composite analysis.	Submit the SRS E-Area Vaults and the Saltstone Disposal Facility composite analysis to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		09/30/1997
R94-02	030	012	The sites will prepare a composite analysis.	Complete the Headquarters technical review and documentation of the SRS E-Area Vaults and Saltstone Disposal Facility composite analysis.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		12/31/1997
R94-02	031		The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open	The last disposal authorization statement by January 31, 2000.	01/31/2000
R94-02	031	001	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for LANL TA-54, Area G.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		04/30/1998

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R94-02.	031	002	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for INEL Radioactive Waste Management Complex.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		05/31/1998
R94-02	031	003	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the NTS Area 5 Radioactive Waste Management Site.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		01/31/2000
R94-02	031	004	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the NTS Area 3 Radioactive Waste Management Site.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		02/28/1999
R94-02	031	005	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the ORNL Solid Waste Storage Area-6.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		06/30/1998
R94-02	031	006	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the Hanford 200-W Burial Grounds.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		06/30/1998
R94-02	031	007	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the Hanford 200-E Burial Grounds.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		07/31/1998
R94-02	031	008	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the Savannah River E-Area Vaults.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		03/31/1998
R94-02	031	009	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of the disposal authorization statement to document any limits on design or operations for the facility.	Issue disposal authorization statement or direction to resolve issues or concerns for the Savannah River Saltstone Disposal Facility.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open		03/31/1998
R94-02	032		Capacity, as used in this Implementation Plan, addresses the quantity of both volume and radionuclide inventory that can be accepted at a disposal facility. The initial LLW disposal	Low-Level Waste Disposal Capacity Report, Revision 0.	IP dated 4/96, Cmt. VIII.B.1.b.1, pg. VIII-4	Complete		07/31/1996

Safety Issues Management System
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			capacity report will only include information on volumetric capacity.			7/31/96		
R94-02	033		Currently available and planned baseline radiological capacity will be determined by analyzing site environmental data and utilizing pathway analysis modeling techniques. The radiological capacity and projection will be contained in the first revision of the disposal capacity report as consideration of radiological source terms are reflected in the radiological assessments.	Low-Level Waste Disposal Capacity Report, Revision 1.	IP dated 4/96, Cmt. VIII.B.1.b.2, pg. VIII-4	Open		09/30/1997
R94-02	034		Based on low-level waste inventory and projections information and the survey of current and planned low-level waste disposal capacity (Task VIII.B.1), a DOE low-level waste projection program will be developed.	DOE Low-Level Waste Projection Program Documentation.	IP dated 4/96, Commitment VIII.B.2, pg. VIII-4	Complete		12/31/1996
R94-02	035		A survey will be conducted to determine the common LLW generating activities at major DOE sites, and identify practices, procedures, policies and techniques that are effective in reducing LLW.	Evaluation and strategy for improvements to LLW minimization.	IP dated 4/96, Commitment VIII.B.3, pg. VIII-5	Complete	Draft report was discussed with Board Staff 8/1/96. A companion report on mixed LLW minimization was sent to the Board on 12/26/96.	08/31/1996
R94-02	036		A survey will be conducted to identify those R&D activities where results are applicable to LLW management program improvements.	Preliminary LLW management R&D activities catalog for initial needs identified by the Board.	IP dated 4/96, Commitment IX.B.1, pg. IX-4	Complete		06/30/1995
R94-02	037		LLW R&D needs will be identified by the RDIT, other 94-2 Implementation Plan task groups, and with input from other DOE-wide R&D or technology development programs.	LLW R&D needs statement.	IP dated 4/96, Commitment IX.B.2, pg. IX-5	Open	Deliverable prepared. Expected to be sent to the Board by April 4, 1997.	03/31/1997
R94-02	038		To evaluate outstanding needs, DOE intends to perform a systematic crosswalk between needs and activities (gap analysis) and use this as a screen of the needs identified in task IX.B.2. In cases where R&D needs are being addressed, these will be documented and provided to the LLW management program with recommendations on how to assimilate their results.	Identification of outstanding R&D needs.	IP dated 4/96, Commitment IX.B.3, pg. IX-5	Open		06/30/1997
R94-02	039		A comprehensive strategy for meeting outstanding LLW R&D needs will be developed for the LLW Management Task Group. The strategy will be developed for inclusion, as appropriate, in the LLW Program Management Plan.	Strategy to address outstanding LLW technical and R&D needs.	IP dated 4/96, Commitment IX.B.4, pg. IX-6	Open		09/30/1997

