

**Department of Energy**

Washington, DC 20585

February 7, 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 October 1, 1996, to December 31, 1996.

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

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DNF SAFETY BOARD

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**

October 1 through December 31, 1996

**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 fifth 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 October 1, 1996, to December 31, 1996.

2.0 OVERVIEW

2.1 General Progress

During this reporting period DOE continued to make very good progress on implementing the activities committed to in the revised DNFSB 94-2 Implementation Plan. The Department completed commitments in three task areas; one in Regulatory Structure and Process, two in Radiological Assessments, and two in Waste Volume Projections. A document providing guidance on integrating DOE Order 5820.2A, "Radioactive Waste Management," with onsite remediation disposal actions was also prepared. Guidance was also provided on the process and criteria for review of low-level waste disposal facility composite analyses and for the preparation and review of disposal facility performance assessments. These three documents will be incorporated into the DOE Order 5820.2A revision efforts.

A mixed low-level waste minimization evaluation and strategy was prepared to augment a similar document prepared during the last reporting period which focused on non-hazardous low-level waste. In addition, documentation was issued on the development of low-level waste projections.

Much of the effort in this reporting period was focused on the development of two documents that are key to the low-level waste management program. Work is underway on the Low-Level Waste Program Management Plan, the culminating document in the Systems Engineering task area. To enhance the integration of DOE's low-level waste management activities across DOE sites, this Plan is being prepared with participation from Headquarters and field organizations.

Similarly, the development of essential requirements for the management of low-level waste is being conducted with input from Headquarters, field, and contractor staff. This effort is part of the DOE Order 5820.2A revision effort. Two workshops were held during this reporting period during which staff performed analyses that will form part of the technical basis for requirements to be included in the revised Order. The revised Order will also incorporate a number of the deliverables that have been undertaken as part of the implementation of DNFSB Recommendation 94-2. These include the interim policy on regulatory structure for low-level waste management, and the policy and guidance on DOE Order 5820.2A compliance for onsite disposal of remediation waste. In addition, other DNFSB 94-2 implementation commitments will be used as is, or with minor modification, as guidance to the revised Order.

In December the DNFSB held a public meeting on the DOE directives system. This meeting addressed DOE rulemaking and Order development. A senior official from the Office of Waste Management provided comment on the DOE Order 5820.2A revision at the meeting.

2.2 Meetings with the DNFSB and Staff

2.2.1 Meetings During this Reporting Period

In this reporting period DOE staff had the following interactions with staff from the DNFSB to discuss implementation activities:

- DOE staff and DNFSB staff met on October 28 at the DOE Order revision workshop in Las Vegas to discuss status and progress of Regulatory Structure and Process activities. Specifically, the process being used to revise the DOE Order on Radioactive Waste Management was reviewed.

- DOE staff met with DNFSB staff on December 3, 1996 to discuss how decontamination and decommissioning activities are to be addressed and to discuss the integration of the Order on Radioactive Waste Management with the proposed 10 CFR 834, "Radiation Protection of the Public and the Environment."

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 will be distributed for review during the next reporting period.

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 IP and their status, as reported in DOE's Safety Issues Management System (SIMS). Two indicators are provided in the first column of the table. The first correlates with the commitment as numbered in the IP. The second number corresponds to the numbering system used in SIMS.

Status of Task Initiatives Due October 31, 1996 - September 30, 1996

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
<u>VI.B.3.b.2</u> R94-02 018	Policy and Guidance Document Issued for RCRA Sites	12/31/96	Completed. A guide for complying with DOE Order 5820.2A for onsite management and disposal was submitted to DNFSB on January 9, 1997.
<u>VII.B.3</u> R94-02 026	Process and Criteria for Headquarters' Review of Composite Analyses	10/31/96	Completed. A guide was submitted to DNFSB on November 1, 1996.
<u>VII.B.4.b.2</u> R94-02 028	PA Format and Content and Standard Review Plan	01/31/97	Completed. An interim guide was submitted to DNFSB on November 1, 1996.
<u>VIII.B.2</u> R94-02 034	DOE Low-Level Waste Projections Program Documentation	12/31/96	Completed. The program description was submitted to DNFSB on December 26, 1996.
Supplemental Commitment	Mixed Low-Level Waste Minimization Evaluation and Strategy	12/31/96	Completed. The document was submitted to DNFSB on December 26, 1996.

4.0 TASK AREA STATUS

4.1 Systems Engineering

During this reporting period, the systems engineering effort made the transition from the development of the *DOE Low-Level Waste System Description Document* to development of the *Low-Level Waste Program Management Plan*. The Low-Level Waste Steering Committee, comprising representatives from Headquarters and DOE field organizations, has taken responsibility for preparation of the plan. The Steering Committee met in November to review and revise the proposed outline of the plan. The Plan will address the low-level waste system configuration, decision criteria for disposal of low-level waste, and describe how ongoing Departmental activities, such as re-engineering, are being integrated with the low-level waste program. Writing assignments for the various sections of the plan were made and individuals have begun preparing their sections

During the next reporting period, the *Low-Level Waste Program Management Plan* is to be completed. A draft will be compiled by early February and distributed for review. During the review, an audience of Headquarters and field staff broader than the Steering Committee will provide input on the plan. This will also include a review for consistency with the DOE Order 5820.2A revision effort. Comments will be evaluated and addressed and the *LLW Program Management Plan* will be issued by the end of March.

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

During the current reporting period, DOE completed the "Guidance for Complying with DOE Order 5820.2A, *Radioactive Waste Management*, for Onsite Management and Disposal of Low-Level Waste Resulting from Environmental Restoration Activities." This guidance addresses onsite disposal of waste derived from Resource Conservation and Recovery Act cleanups and supplements an earlier policy addressing onsite disposal of waste from Comprehensive Environmental Response, Compensation, and Liability Act activities. The policy and guidance from these memoranda will be incorporated in the DOE Order 5820.2A revision documentation.

The DOE Order 5820.2A revision low-level waste team met at two workshops in conjunction with the Order revision effort. The first workshop was held in Las Vegas, NV in October. Using the low-level waste system functional breakdown developed under the Systems Engineering task as a starting point, the team conducted a hazard and safety analysis. Each function was operationally described, then scenarios were developed by which a failure could develop. These were then analyzed to identify the weaknesses that contributed to the failure. At the second workshop, held in Rosslyn, VA in December, the hazard and safety analysis was used as the basis for a requirements analysis. Various sources of information, including DOE Orders, external regulations, and international guidance, were used to identify requirements that would mitigate the weaknesses found in the hazard and safety analysis.

In the next reporting period, the requirements identified from the requirements analysis will be evaluated and combined to provide the basis for the low-level waste chapter of the DOE Order 5820.2A revision. The initial set of requirements will be reviewed for regulatory gaps and supplemented to add administrative requirements. A draft low-level waste chapter will be ready for review by the end of February.

4.4 Radiological Assessments

During the current reporting period, the Department completed two commitments in the Radiological Assessments task area. The Department issued the *Interim Review Process and Criteria for Department of Energy Low-Level Waste Disposal Facilities Composite Analyses*. This document establishes the process that will be used for the review of composite analyses which evaluate the combined potential radiological impact of a low-level waste disposal facility and other sources of radiation present at a DOE site.

In response to a DNFSB condition of acceptance of the May 1996 revision of the 94-2 Implementation Plan, the Department accelerated the issuance of the *Interim Format and Content Guide and Standard Review Plan for U.S. Department of Energy Low-Level Waste Disposal Facility Performance Assessments*. The guidance document was originally scheduled to be completed by the end of January 1997. However, since the Department was involved in the review of performance assessments during the summer and fall of 1996, it was agreed that it made sense to complete this document as soon as possible to build from and support those reviews. The document provides guidance for both the preparers and reviewers of performance assessments. Specifically, it describes the sections and types of information that should be included in performance assessments and addresses topics that have been the source of uncertainty and confusion for the preparers and reviewers of performance assessments. The guidance was issued as interim in

recognition of the need for consistency with the Department's proposed 10 CFR 834, "Radiation Protection of the Public and the Environment," and the DOE Order 5820.2A revision. Key topics on which the staff is working towards resolution include the point of evaluation for compliance with the dose objectives and the time period over which compliance is to be evaluated.

A second DNFSB condition of acceptance of the revised Implementation Plan was that the Department should not drop the task in the original plan to evaluate ways of diversifying the Performance Assessment Peer Review Panel. Consistent with the spirit of this commitment, DOE Headquarters has taken steps to establish a DOE-staffed group that will have the responsibility for the review and recommending approval of performance assessments and composite analyses. As currently conceived, the group would be co-chaired by staff from the Offices of Waste Management and Environmental Restoration with the balance of the members coming from the DOE field organizations. The Peer Review Panel would continue to provide technical review at the request of the DOE review group. In December a memorandum was sent to the field requesting nominees to serve in the group.

During the next reporting period, DOE will proceed with its review of the Hanford Site 200 East Area low-level waste burial ground performance assessment. The DOE review group and the Peer Review Panel will both be involved in the review.

4.5 Low-Level Waste Projections

During this reporting period, DOE completed two waste projection commitments from the DNFSB 94-2 Implementation Plan. On December 26, 1996, the low-level waste projections program guidance was transmitted to the DNFSB. This document establishes a framework for developing projections of volumes and characteristics of low-level waste which is consistent with projections work that has evolved over the last few years, such as the Baseline Environmental Management Report, the Ten-Year Plan, and the Core Data Bases. The intent is to provide improved, routine projections.

In the previous reporting period, the Department completed the *Low-Level Radioactive Waste Minimization Evaluation and Strategy*. Through staff discussions, it was agreed that a complementary document, a *Mixed Low-Level Waste Minimization Evaluation and Strategy*, would also be prepared. The report was transmitted to the DNFSB on December 26, 1996. The report evaluated waste minimization practices at selected production and cleanup sites, identified common mixed low-level waste generating activities, and recommended minimization practices. The document is one element supporting the 1996 Pollution Prevention Program Plan.

There are no near-term commitments in the Waste Volume Projections task area. Work is continuing on the development of a method to evaluate the radiological capacity of DOE's low-level waste disposal facilities. This is a September 1997 deliverable.

4.6 Research and Development

The Department is in the process of establishing centers of excellence at field locations for key waste management activities. The Idaho Operations Office will be the Low-Level Waste Center of Excellence. Discussions are ongoing between the site and Headquarters regarding the division of roles and responsibilities. It is contemplated that the DNFSB 94-2 research and development activities will be one of the first activities for which the Center takes responsibility. The Department expects to finalize arrangements and initiate work during the next reporting period.

Appendix

**Safety Issues Management System
Report for Recommendation 94-2
October 1, 1996 - December 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	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 06/27/1996		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 07/29/1996	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 11/01/1996		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	Open		01/31/1997
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 06/30/1995		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 04/26/1996		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 10/07/1996	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 10/02/1996	Deliverable letter of 10/2/96 for the Privatization Guidelines Report commits to include in the PMP guidance and criteria for sites to use when considering disposal options.	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	Open		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 07/31/1996		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 07/31/1996		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 03/04/1996	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 11/30/1995		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 04/12/1996		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 05/17/1996	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 05/31/1995		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 07/21/1995	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 07/31/1996		07/31/1996
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	Policy and guidance document issued for CERCLA sites.	IP dated 4/96, Commitment VI.B.3.b.1, pg. VI-7	Complete	Discussed in meeting with Board Staff on 5/3/96.	05/31/1996

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
			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.			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	Open	RCRA deliverable drafted and in review. Expect final signature by 1/6/97.	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		12/29/1995
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	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	Open	Ongoing.	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	Open	Ongoing.	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	Open	Ongoing. In response to the Board's IP revision acceptance condition, Department will strengthen recusal process and evaluate ways to diversify PRP as part of this deliverable.	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	Open		01/31/1997
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
						04/30/1996		

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. Joc Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
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 11/01/1996		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 10/01/1996		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 11/01/1996	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		12/31/1997
R94-02	029	003	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 INEL Radioactive Waste Management Complex performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete 08/30/1996	PRP recommended approval at July meeting. PA accepted with conditions.	08/31/1996
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	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete	PA accepted with conditions.	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 Letourneau

DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
				Site performance assessment.		08/30/1996		
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 200-E Burial Ground performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open	Under HQ review at this time.	04/30/1997
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	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

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DR Contact Mr. Joe Arango

Board Contact Mr. Steve Stokes

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						07/31/1996	additional groundwater analysis information is received and reviewed.	
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		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 documentation of the NTS Area 5 Radioactive Waste Management Site composite analyses.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		12/31/1999
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

Safety Issues Management System

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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
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	Issue disposal authorization statement or direction to resolve	IP dated 4/96, Commitment	Open		01/31/2000

Safety Issues Management System
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			the disposal authorization statement to document any limits on design or operations for the facility.	issues or concerns for the NTS Area 5 Radioactive Waste Management Site.	VII.B.5.b.3, pg. VII-9			
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 capacity report will only include information on volumetric capacity.	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
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	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

Safety Issues Management System
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R94-02	034		assessments. 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 12/26/1996		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 08/30/1996	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		06/30/1995
R94-02	037		LLW R&D needs will be identified by the RDTT, 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		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