



96-0003040

## Department of Energy

Washington, DC 20585

July 29, 1996

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

Dear Mr. Chairman:

Enclosed is the quarterly progress report on implementation of Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 94-2 for the period from April 1, 1996, to June 30, 1996. This document is a deliverable pursuant to the commitment in Task Initiative III.C.2 identified in the Department of Energy's Implementation Plan, Revision 1, for DNFSB Recommendation 94-2.

As discussed in the progress report, the Department submitted the revised Implementation Plan for Recommendation 94-2 to the Board on May 7, 1996, and has continued to make progress in key task areas, including completing the initiatives for the complex-wide review.

The body of the progress report contains a status table on the task initiatives that were due during the reporting period. A status table on all of the task initiatives is included as an appendix. Both of these tables refer to due dates in the revised Implementation Plan.

Sincerely,

Stephen Cowan  
Deputy Assistant Secretary  
for Waste Management  
Environmental Management

Enclosure

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**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**

**April 1 through June 30, 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, Defense Nuclear Facilities Safety Board Recommendation 94-2" in March 1995. In June 1995 the Defense Nuclear Facilities Safety Board (DNFSB) sent the Department a letter which conditionally accepted the Implementation Plan.

This is the third report on the status of task initiatives as described in the Implementation Plan that the Department is undertaking to improve its management of low-level waste (LLW). This report covers the period from April 1, 1996, to June 30, 1996.

During the current reporting period DOE revised the Implementation Plan (Rev. 1) and submitted it to the DNFSB on May 7, 1996, while also making progress in key task areas. All 94-2 Implementation Plan deliverables due during the period covered by this report were issued and transmitted to the Board within schedule.

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

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

## **2.0 OVERVIEW**

### **2.1 General Progress**

During this quarter, the revision of the Implementation Plan was completed and submitted to the DNFSB. The Implementation Plan was revised through the development of improved logic in the relationships between task initiatives, and the development of further resource loading estimates and planning for completing the initiatives. The revised Implementation Plan also reflects schedule refinements to better coordinate with ongoing efforts to revise the DOE Order on Waste Management (Order 5820.2A). A revised Project Management Plan reflecting the revisions to the Implementation Plan was also prepared, detailing the resources and approaches for completing the 94-2 task initiatives, and was delivered to the DNFSB during this reporting period.

Task initiatives under the Complex-Wide Review were completed, and the final Complex-Wide Review Report was issued in May 1996. Progress on Systems Engineering task initiatives has been steady, with issuance of the Program Requirements Document in April 1996. Progress on several tasks in the Regulatory Structure and Process and the Radiological Assessment task areas were completed or initiated in this quarter in accordance with the schedules outlined in the revised Implementation Plan and Project Management Plan. These include issuance of policy and guidance on the applicability of Order 5820.2A to LLW disposal sites developed under the Comprehensive Environmental Response, Compensation, and Liability Act, and the Headquarters acceptance of the Hanford 200-W Burial Grounds radiological performance assessment.

Low-Level Waste Projections task initiatives, which had been delayed, are being developed in accordance with the schedule detailed in the revised Implementation Plan, beginning with preparation of a volumetric disposal capacity report which will be submitted to the DNFSB next quarter. Research and Development task initiatives are continuing on hold until the start of fiscal year 1997, consistent with the logic and schedules reflected in the revised Implementation Plan.

### **2.3 Meetings with the DNFSB and Staff**

In this reporting period, two meetings were held with the DNFSB:

- DOE staff briefed the DNFSB on April 16, 1996, on the results of the Complex-Wide Review.
- DOE staff briefed the DNFSB on April 26, 1996, on the revision to the Implementation Plan.

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

- DNFSB staff and the DOE staff met on May 3, 1996, to discuss the Policy for Demonstrating Compliance with DOE Order 5820.2A for Onsite Management and Disposal of Environmental Restoration Low-Level Wastes under the Comprehensive Environmental Response, Compensation, and Liability Act.
- DOE staff and DNFSB staff held a number of status conference calls during the 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 Implementation Plan and their status, as reported in the Department'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 April 1 - June 30, 1996**

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
<u>III.C.1</u> R94-02 001	Updated Project Management Plan (Revision 1).	06/30/96	Completed. Revised Project Management Plan transmitted to DNFSB on June 27, 1996.
<u>IV.B.2</u> R94-02 004	Low-Level Waste Program Requirements Document	04/30/96	Completed. LLW Program Requirements Document submitted to DNFSB on April 26, 1996.
<u>V.B.3</u> R94-02 012	Complete independent assessments and prepare Preliminary Complex-Wide Review Report	04/12/96	Completed. Preliminary CWR Report submitted to DNFSB on April 12, 1996.
<u>V.B.3</u> R94-02 013	Prepare Final Complex-Wide Review Report	05/17/96	Completed. Final CWR Report submitted to DNFSB on May 17, 1996.
<u>VI.B.3.b.1</u> R94-02 017	Clarify Applicability of DOE Order 5820.2A to sites subject to CERCLA	05/31/96	Completed. Policy and Guidance submitted to the DNFSB on May 31, 1996.
<u>VI.B.4.b.2</u> R94-02 020	Comparison Report on International Standards and Requirements	06/30/96	Completed. Comparison Report transmitted to DNFSB on June 11, 1996.

**Status of Task Initiatives Due April 1 - June 30, 1996**

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
<u>VII.B.2</u> R94-02 025	Composite Analysis Guidance	05/31/96	Completed. Composite analysis guidance submitted to the DNFSB on April 30, 1996.
<u>VII.B.5.b.1</u> R94-02. 029.009	Complete Headquarters action on Hanford 200-W PA	06/30/96	Completed. Hanford 200-W PA compliance assessment submitted to the DNFSB on June 27, 1996.

**4.0 TASK AREA STATUS**

**4.1 Systems Engineering**

During this reporting period, the Low-Level Waste Program Requirements Document was completed and submitted to the DNFSB on April 30, 1996.

Following completion of the program requirements document, DOE held a workshop the week of May 20, 1996, with Field Office representatives to begin preparing the systems description document. The system description document will include the allocation of the requirements to system functions, an effort that has continued during the current reporting period. It will focus on the major functions and interfaces of the system: generation, treatment, storage, and disposal. The system description document will establish the technical scope, or baseline, for the LLW Program Management Plan. The systems description document and the privatization guidance are on schedule to be completed in September 1996. A weekly teleconference is held with participants in the LLW systems engineering task initiatives to continue development of this document.

Following completion of the Complex-Wide Review Report (see 4.2), preparation of site-specific and complex-wide corrective action plans was initiated. A memorandum providing direction on the preparation of the corrective action plans was prepared and distributed to the Field Offices. The preparation of the Corrective Action Plans are on schedule to be completed in July 1996.

## 4.2 Complex-Wide Review (CWR)

During the current reporting period, the Preliminary and Final Complex-Wide Review Reports were completed. The preliminary report was transmitted to the DNFSB on April 12, 1996, and the final report was transmitted to the DNFSB on May 17, 1996. This completed all Complex-Wide Review task initiatives. DOE-wide and site-specific corrective actions in response to the Complex-Wide Review are being prepared and will be addressed under a Systems Engineering task initiative and are discussed in 4.1 above.

## 4.3 Regulatory Structure and Process

During the quarter covered by this report, the policy and guidance on the applicability of LLW disposal sites developed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was issued (May 31, 1996). Also, the report "Comparison of Low-Level Waste Disposal Programs of DOE and Selected International Countries" was finalized and issued on June 11, 1996. The report provides discussions and tables comparing selected DOE LLW management requirements, practices, and standards with those of Sweden, the United Kingdom, France, and Canada.

Also during the reporting period, a working group was established to begin developing the requirements and implementation guidance that will eventually become the input to the LLW Chapter of the revised DOE Order on Radioactive Waste Management. During the systems engineering workshop held the week of May 20, 1996, with Field Office representatives, members of this group began preparing some of the essential requirements documentation.

During the next quarter, the revised interim policy to clarify and strengthen the LLW management regulatory structure will be issued. This interim policy was originally issued in July 1995, but requires a revision due to the revised approach on conducting radiological assessments that is described in the revised Implementation Plan. Work will continue on developing requirements and guidance for the LLW chapter of the revised radioactive waste management Order.

## 4.4 Radiological Assessments

The revised Implementation Plan describes the Department's new approach of preparing three related documents as part of each disposal site's radiological assessment: (1) the performance assessment or CERCLA/RCRA documentation, as appropriate, (2) the composite analysis, and (3) the disposal authorization statement. The performance assessment (or CERCLA/RCRA documentation) is a tool to be used in designing a disposal facility and justifying the operational constraints (e.g., waste acceptance criteria). The composite analysis is a separate assessment of the impacts of other sources of radioactive material (past disposal sites, spills, etc.) that contribute to the projected radiological dose to an offsite member of the public from an active or planned LLW disposal facility. The composite analysis would be

prepared to demonstrate that the potential dose to a person at the point of public access, the land-use boundary, would not exceed specified limits. The disposal authorization statement is the authorization for the facility to operate under the conditions that are described in the performance assessment (or CERCLA/RCRA documentation) and composite analysis, and cannot be issued until the performance assessment and composite analysis have been completed and approved.

During the period covered by this report, the guidance for conducting the composite analysis was issued. Nevada Test Site personnel developed information necessary for the Peer Review Panel to complete its technical review of the Area 5 performance assessment. Headquarters resolved technical and policy issues on the Idaho National Engineering Laboratory's Radioactive Waste Management Complex (RWMC) performance assessment, enabling Idaho personnel to finalize the performance assessment. A compliance evaluation was completed on the Hanford 200-W Burial Grounds performance assessment by Headquarters, and was issued on June 27, 1996.

There are four performance assessment task initiatives in the revised Implementation Plan that are projected for completion during the next quarter:

- Issue Headquarter's acceptance of the Savannah River Saltstone Disposal Facility performance assessment (July 1996),
- Issue Headquarter's acceptance of the Idaho National Engineering Laboratory Radioactive Waste Management Complex performance assessment (August 1996),
- Issue Headquarter's acceptance of the Nevada Test Site Area 5 performance assessment (August 1996),
- Submittal of the Hanford 200-E Burial Grounds performance assessment (August 1996).

Also, an Interim Standard Review Plan for review of DOE LLW disposal facility performance assessments is being prepared based on the use of compliance evaluations of performance assessments being submitted to Headquarters for review and acceptance.

#### 4.5 Low-Level Waste Projections

During the reporting period, the draft Disposal Capacity Report was reviewed by DOE Headquarters and Field staff. Comments are currently being resolved in the report for issuance in July 1996. As described in the revised Implementation Plan, subsequent reports will be prepared that will also address radiological constraints on capacity. Data on radiological capacity will be obtained from performance assessments and composite analyses conducted by the sites, and as a result of the development of the projections program which is due December 1996. Development of the LLW minimization strategy continues, and the report is on schedule to be completed in August 1996.



#### **4.6 Research and Development**

Task initiatives for LLW research and development remain on hold in accordance with the logic and schedules in the revised Implementation Plan. A meeting of the Research & Development Task Team (RDTT) will be held in the next quarter in order to properly initiate the fiscal year 1997 research and development task initiatives. Activities being conducted by the Office of Science and Technology, particularly the Mixed Waste Focus Area and the Subsurface Contaminants Focus Area, will be addressed by the RDTT for appropriate consideration in the identification of outstanding LLW R&D needs.

## **Appendix**

### **Safety Issues Management System**

**Report for Recommendation 94-2 - June 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	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	Open	Currently preparing quarterly report for April-June.	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	Open		10/31/1996
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	Open	Progress on schedule.	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	Open	Sandia National Labs has been asked to assist.	09/30/1996
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	Open	Being prepared for internal review by 7/15/96.	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	Initial site-specific corrective action plans.	IP dated 4/96, Commitment	Open	Sites preparing for HQ review by 7/15/96.	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
			activities.		IV.B.6.b.2, pg. IV-6			
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	Open	Sent to field for review and comments. Comments currently being incorporated.	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 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  05/31/1996	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	Open		12/31/1996

**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	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		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  06/11/1996	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.	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  04/30/1996	April 30, 1996 letter (Cowan and Owendoff to Conway) provided guidance document. Board Staff is providing comments to the Board for response to the Department.	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	Open		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	PA maintenance guidance document.	IP dated 4/96, Commitment VII.B.4.b.1, pg. VII-8	Open	Resolving issues with EH-41.	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
			necessary.					
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	Open		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	Open	Guidance provided by HQ to INEL re: ground water point of compliance - PRP reviewing in July.	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 Site performance assessment.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open	HQ review ongoing. Additional information to be requested from site.	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	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Open		11/30/1998

**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.				
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
						06/27/1996		
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	Open	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	Open	Under HQ review and on schedule. No problems anticipated.	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		12/31/1997
R94-02	030	002	The sites will prepare a composite analysis.	Complete the Headquarters technical review and	IP dated 4/96, Commitment	Open		03/31/1998

***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
				documentation of the LANL TA-54, Area G, composite analyses.	VII.B.5.b.2, pg. VII-9			
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
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	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Open		05/31/1998



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				analysis.				
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 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	Issue disposal authorization statement or direction to resolve	IP dated 4/96, Commitment	Open		06/30/1998

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**Summary Recommendation Report - Key Commitment and Action Information**

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			disposal authorization statement to document any limits on design or operations for the facility.	issues or concerns for the Hanford 200-W Burial Grounds.	VII.B.5.b.3, pg. VII-9			
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	Open	To be delivered in July. Currently being reviewed internally.	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 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	Open	Progress ongoing.	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	Open	Progress ongoing.	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 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

***Safety Issues Management System***  
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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