

## DEFENSE NUCLEAR FACILITIES SAFETY BOARD

January 6, 2012

**MEMORANDUM FOR:** T. J. Dwyer, Technical Director  
**FROM:** B.P. Broderick and R.T. Davis  
**SUBJECT:** Los Alamos Report for Week Ending January 6, 2012

**Transuranic Waste Operations:** In 2005, the Department of Energy/National Nuclear Security Administration (DOE/NNSA) and the New Mexico Environment Department (NMED) entered into a formal Compliance Order on Consent (Consent Order) that set legally-binding schedule milestones for environmental remediation and restoration activities at LANL. A key Consent Order milestone results in the termination of activities and closure of Area G, which drives a need to remove all above-ground and retrievable below-ground transuranic waste from Area G and complete all necessary environmental corrective measures by the end of 2015.

This week, DOE/NNSA and NMED jointly issued a new Framework Agreement that describes a realignment of environmental priorities at LANL. The Framework Agreement differentiates between different types of Area G transuranic waste based on the relative risk of the material being released or dispersed in accidents, including wildland fires. On this basis, above-ground non-cemented transuranic waste receives a higher priority for disposition than cemented or below-ground transuranic waste. The Framework Agreement includes the following DOE/NNSA commitments:

- Complete removal of all non-cemented above-ground legacy transuranic waste at Area G by June 30, 2014;
- Complete removal of all newly generated transuranic waste that is received at Area G in FY12 and FY13 by December 31, 2014; and
- Develop, by December 31, 2012, a plan and schedule for the removal of retrievable below-ground transuranic waste at Area G.

Although all parties to the Consent Order endorse the Framework Agreement, it is not legally-binding and the existing Consent Order remains in force. In conjunction with this week's joint issuance of the Framework Agreement, DOE/NNSA publically acknowledged that it is not possible to meet the current Consent Order milestone to complete Area G clean-up activities by the end of 2015. The Framework Agreement notes that DOE/NNSA and NMED will meet at an appropriate time to consider Consent Order changes.

**Federal Oversight:** In September, the site office requested LANL to evaluate Plutonium Facility and Waste Disposition Project nuclear safety issues; determine deficiencies, causal factors and the extent of problematic conditions across the site; and provide a comprehensive report on planned actions and a suite of performance metrics to monitor conditions and progress. In December, LANL responded to this request and submitted the LANS Nuclear Safety Culture Analysis and Improvement Plan, which details the site's plans for review and causal analysis of nuclear safety issues. A project team has been assigned to execute this plan and LANL intends to implement corrective actions as they are identified by the team. In addition, an initial set of performance metrics, which will be refined as the project progresses, have been identified to track improvements in nuclear safety. At this point, the LANL submittal only provides an initial plan for identification of nuclear safety improvements in Fiscal Year 2012.