



Department of Energy

Washington, DC 20585

October 23, 1998

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 Recommendation 94-2 for the period from July 1, 1998, to September 30, 1998. The report addresses the Recommendation 94-2 task initiatives which have not yet been completed, as well as Departmental activities closely related to the task initiatives committed to in response to DNFSB Recommendation 94-2.

The report shows that the Department made good progress on major activities during this reporting period. The progress includes: issuance of the disposal authorization statement for the Los Alamos National Laboratory Low-Level Waste Disposal Area G, issuance of the *Low-Level Waste Disposal Capacity Report, Revision 1*, completion of the *Complex-Wide Strategy for Maintenance of Department of Energy Low-Level Waste Disposal Facility Performance Assessments and Composite Analyses* and completion of the *Low-Level Waste Disposal Facilities Federal Review Group: Interim Performance Assessment and Composite Analysis Review Guidance Manual*. A status table in the report provides the status of all of the Recommendation 94-2 task initiatives.

If you have any questions concerning this information, please contact me at (202) 586-7710 or Mark Frei at (202) 586-0370.

Sincerely,

A handwritten signature in cursive script that reads "James M. Owendoff".

James M. Owendoff
Acting Assistant Secretary
for Environmental Management

Enclosure

cc:
Mark B. Whitaker, Jr., S-3.1
Carol Peabody, EM-4

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**

July 1 through September 30, 1998

**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 (DNFSB) Recommendation 94-2" in March 1995. In May 1996 DOE issued a revision to the Implementation Plan that reflected enhancements to DOE's approaches to 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 Implementation Plan, with conditions. In a July 9, 1998 letter to the Board, the Secretary of Energy proposed revised dates for the DNFSB 94-2 commitments that had not been completed. In addition, the Department committed to reporting on a number of other activities closely related to the DNFSB 94-2 implementation tasks.

This quarterly report focuses on progress made towards completing the tasks outlined in the Secretary's July 9, 1998 letter. The attachment provided with this report provides a full report on the status of all of the DNFSB Recommendation 94-2 task initiatives.

2.0 OVERVIEW

2.1 General Progress

During this reporting period the Department completed a number of commitments in the Implementation Plan and completed a significant number of interim activities in support of the commitments. The Department issued the disposal authorization statement for the Los Alamos National Laboratory Low-Level Waste Disposal Area G authorizing the continued operations of the facility subject to the conditions in the disposal authorization statement. The Low-Level Waste Disposal Facilities Federal Review Group and the subordinate review teams continued their review activities of the other disposal facilities. The review teams for radiological assessments at the Oak Ridge Reservation and the Savannah River Site completed their reports. The Low-Level Waste Disposal Facilities Federal Review Group met to consider the reports and the related performance assessments/composite analyses, and make recommendations to the Department's senior management on the course of action to be taken for each disposal facility. In addition, the Nevada Test Site Area 3 review team completed the bulk of its review and is in the process of preparing its report.

The draft DOE Order, *Radioactive Waste Management*, and the associated manual were made available for public review through a notice in the Federal Register. The comment period has closed and staff are in the process of evaluating comments and determining resolutions. The commitment to develop a guidance document for the review of performance assessments and composite analyses was completed with the preparation of the *Low-Level Waste Disposal Facilities Federal Review Group Manual*. The Department also completed the last commitment in the Low-Level Waste Projections task area with the issuance of the *Current and Planned Low-Level Waste Disposal Capacity Report, Revision 1*. And lastly, a strategy for using the maintenance of low-level waste disposal facility performance assessments and composite analyses as a driving force for addressing research and development in support of low-level waste management was prepared.

2.2 Meetings with the DNFSB and Staff

2.2.1 Meetings During this Reporting Period

During the current reporting period, the following meetings were held:

- DOE and DNFSB staff met on July 8, 1998 to present the current status of the Recommendation 94-2 tasks and the revisions of the DOE Order on *Radioactive Waste Management*.
- DOE and DNFSB staff met in September 1998 to discuss the review of the DOE Order on *Radioactive Waste Management*.

2.2.2 Meetings in Future Reporting Periods

The following meetings between the Department and the DNFSB/staff are proposed for the next reporting period:

- DOE and DNFSB staff will meet to discuss resolution of comments and finalization of the draft *Radioactive Waste Management Order* revision.
- DOE will brief the DNFSB on the final revision of the *Radioactive Waste Management Order*.

3.0 SUMMARY OF COMMITMENTS DUE

The following tables summarize the status of the remaining DNFSB Recommendation 94-2 commitments and the additional low-level waste-related task initiatives on which the Department is reporting.

For those commitments that were included in the Implementation Plan, there are at least two indicators provided in the first column. Those listed in the format "VIII.B.1.b.2" are

task numbers as listed in the Implementation Plan. Those in the format "R94-02 033" are identification numbers as reported in the Department's Safety Issues Management System (SIMS). A full copy of the SIMS report is included as an appendix to this report. The Status column provides a brief description of the status of the task initiative. Substantive changes in status since the previous report are presented in bold.

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
FISCAL YEAR 1998			
<u>VII.B.5.b.2</u> R94-02 030-009	Submit Hanford Site composite analysis to Headquarters for review.	06/30/98	Completed. The composite analysis was submitted to Headquarters in March 1998. A letter notifying the DNFSB of completion was transmitted on 7/10/98. Team Leader selected. Review is being scheduled based on team member availability.
<u>VII.B.5.b.2</u> R94-02 030-003	Submit Idaho Radioactive Waste Management Complex composite analysis to Headquarters for review.	06/30/98	Completed. The composite analysis was submitted to Headquarters in May 1998. A letter notifying the DNFSB of completion was transmitted on 7/10/98. Team Leader is being selected.
<u>VII.B.5.b.1/2/3</u> R94-02 029-002 R94-02 030-002 R94-02 031-001	Complete Headquarters' review of LANL performance assessment. Complete Headquarters' review of LANL composite analysis. Issue disposal authorization statement.	08/31/98 08/31/98 09/30/98	Completed. Headquarters completed its review and issued a disposal authorization statement with conditions to the site. A copy of the disposal authorization statement was transmitted to the Board on 10/2/98.

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
<u>VIII.B.1.b.2</u> R94-02 033	Issue Low-Level Waste Disposal Capacity Report, Revision 1.	08/31/98	Completed. The report was transmitted to the Board on 9/17/98.
<u>IX.B.3</u> R94-02 038	Determine Outstanding LLW R&D Needs.	08/31/98	Completed IX.B.3. The report was transmitted to the Board on 10/1/98.
<u>IX.B.4</u> R94-02 039	Prepare Strategy to Address LLW R&D Needs.	08/31/98	Partially completed IX.B.4. A strategy for addressing R&D needs through the maintenance of radiological assessments was transmitted to the Board on 10/1/98. A process for implementing the strategy will be shared with Board staff by the end of the calendar year 1998.
<u>VII.B.5.b.2/3</u> R94-02 030-012	Complete Headquarters' review of Savannah River Site composite analysis.	09/30/98	In progress. In June 1998, the review team submitted its report to the LLW Disposal Facilities Federal Review Group. The Group is in the process of evaluating the report and composite analysis.
R94-02 031-009	Issue Saltstone disposal authorization statement.	09/30/98	
<u>VII.B.5.b.2/3</u> R94-02 031-008	Issue E-Area Vaults disposal authorization statement.	09/30/98	In progress. In June 1998, the review team submitted its report to the LLW Disposal Facilities Federal Review Group. The Group is in the process of evaluating the report and composite analysis.

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

<u>IP Task #</u> SIMS ID #	Title or Description	Due Date	Status
FISCAL YEAR 1999			
<u>VII.B.5.b.1/2/3</u> R94-02 029-008 R94-02 030-008 R94-02 031-005	Complete Headquarters' review of Oak Ridge Solid Waste Storage Area 6 performance assessment. Complete Headquarters' review of SWSA-6 composite analysis. Issue disposal authorization statement.	10/15/98 10/15/98 10/15/98	In progress. Review team has submitted its report to the LLW Disposal Facilities Federal Review Group. The Group reviewed the report, the performance assessment, and the composite analysis, and on August 19, 1998 sent a letter to the site requiring a plan to address issues. Held discussions with the site concerning the issues and closure. The site is developing a response to the issues.
<u>VII.B.5.b.1/2/3</u> R94-02 029-006 R94-02 031-004	Complete Headquarters' review of the Nevada Test Site Area 3 performance assessment/ composite analysis. Issue disposal authorization statement.	10/31/98 10/31/98	In progress. Review team has completed its review and developed a report. A draft of the report is under review by the review team.
<u>VII.B.5.b.2</u> R94-02 030-010	Complete Headquarters' review of Hanford composite analysis; document conclusion relative to Environmental Restoration Disposal Facility.	03/31/99	Pending. Review team leader has been selected; review will commence in the first quarter of FY 1999.
<u>VII.B.5.b.2/3</u> R94-02 031-006	Issue 200 West Area burial grounds disposal authorization statement.	03/31/99	Pending. Dependent on review of Hanford composite analysis.

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

<u>IP Task #</u> <u>SIMS ID #</u>	Title or Description	Due Date	Status
<u>VII.B.5.b.2/3</u> R94-02 031-007	Issue 200 East Area burial grounds disposal authorization statement.	03/31/99	Pending. Dependent on review of Hanford composite analysis.
<u>VII.B.5.b.2/3</u> R94-02 030-004	Complete Headquarters' review of Idaho composite analysis.	05/15/99	Pending. Review team leader has been selected; review will commence in the second quarter of FY 1999.
R94-02 031-002	Issue disposal authorization statement.	05/15/99	
<u>VII.B.5.b.2</u> R94-02 030-005	Submit Nevada Test Site Area 5 composite analysis to Headquarters for review.	09/30/99	In progress. Work is underway to complete the composite analysis before the end of the fiscal year.
FISCAL YEAR 2000			
<u>VII.B.5.b.2/3</u> R94-02 030-006	Complete Headquarters' review of Nevada Test Site Area 5 composite analysis.	06/30/00	Pending. Task will start upon receipt of the composite analysis.
R94-02 031-003	Issue disposal authorization statement.	06/30/00	

Status of Related Low-Level Waste Management Initiatives Not Included in Implementation Plan

Title or Description	Proposed Due Date	Status
FISCAL YEAR 1998		
Complete guidance manual for the Low-Level Waste Disposal Facilities Federal Review Group	08/31/98	Completed. A guidance manual for the review of performance assessments and composite analyses has been prepared. The manual was transmitted to the Board on 9/17/98.
Complete revision of Radioactive Waste Management Order, Manual, and guidance.	09/30/98	In progress. Draft Order, Manual, and Contractor Requirements Document, were made available for public review on 7/31/98. Revisions based on consideration of the comments are in preparation.
FISCAL YEAR 1999		
Complete Headquarters' review of the Hanford LLW Glass Disposal Facility performance assessment and issue disposal authorization statement.	03/31/99	Pending. Richland Operations Office submitted the performance assessment to Headquarters for review in March 1998. Review team leader is being selected; performance assessment review will commence in the first quarter of FY 1999.

4.0 TASK AREA STATUS

4.1 Regulatory Structure and Process

The draft order, DOE O 435.1, *Radioactive Waste Management*, the accompanying manual, DOE M 435.1, *Radioactive Waste Management Manual*, guidance, and technical basis documentation were issued for DOE and DNFSB review on February 28, 1997. Issuance of the draft documents completed the DNFSB Recommendation 94-2 commitments in this task area. For purposes of continuity, finalization of the *Radioactive Waste Management* directives, which address high-level and transuranic waste as well as low-level waste, is being tracked under this task area.

During this reporting period, the Order, Manual, and related Contractors Requirements Documents, were prepared in draft and made available for a 30-day public review period through a notice in the Federal Register. During the review period, work continued on the guidance document which is to accompany the Order and Manual. Over a dozen individuals or organizations submitted comments on the Order and Manual. At the end of the reporting period, the comments were being reviewed to determine which would cause a change to the Order and Manual.

During the next reporting period, the DOE will revise all of the documents based on comments received from the public, DNFSB staff, DOE organizations, DOE contractors, and the panel of experts assembled to provide an independent review of the order revision products. Following resolution of the comments, the Order and related documents will be coordinated throughout DOE to obtain the concurrences necessary for issuance as DOE directives.

The Department has also committed to the preparation of a guidance manual for the DOE review of performance assessments and composite analyses. The Department established a Low-Level Waste Disposal Facilities Federal Review Group and charged it with reviewing low-level waste disposal facility performance assessments and composite analyses for technical adequacy and projections of compliance, and recommending action (approval, approval with conditions, disapproval) to the Environmental Management Deputy Assistant Secretaries. During this reporting period, the Group reviewed another draft of the manual and provided final comments. The comments were resolved and the *Low-Level Waste Disposal Facility Federal Review Group Manual* was issued for use. A copy of the manual was transmitted to the DNFSB on September 17, 1998. The current version of the manual provides guidance for review of performance assessments prepared in accordance with DOE Order 5820.2A, *Radioactive Waste Management*, and composite analyses prepared in accordance with the DNFSB Recommendation 94-2 *Implementation Plan*. The plan is to revise the manual after DOE O 435.1 is issued to reflect any revisions and also to incorporate feedback from previously conducted reviews.

4.2 Radiological Assessments

During the current reporting period, the Low-Level Waste Disposal Facilities Federal Review Group and its review teams made significant progress on reviewing radiological assessments and recommending action on disposal authorization statements at four of the six DOE sites with low-level waste disposal facilities.

During the previous reporting period, the review team submitted its report on the performance assessment and composite analysis for the Los Alamos National Laboratory Area G disposal facility. Following its analysis of the review report and the radiological assessment, the Low-Level Waste Disposal Facilities Federal Review Group developed a compliance evaluation, drafted a disposal authorization statement, and recommended issuance of the disposal authorization statement with conditions. On October 2, 1998, the Deputy Assistant Secretary for Waste Management and the Deputy Assistant Secretary for Environmental Restoration issued the disposal authorization statement which included conditions for Los Alamos National Laboratory to perform additional studies to address uncertainties in data and parameters used in the radiological assessment.

On July 21 and 22, 1998, the Low-Level Waste Disposal Facilities Federal Review Group met at the Oak Ridge Reservation to complete its review of the Solid Waste Storage Area 6 performance assessment and composite analysis. The review team had previously provided a copy of its report to the Group. After discussion with the review team leader and among the Group members, it was decided that the performance assessment and composite analysis were incomplete and the review could not be completed. On August 19, 1998, a memorandum was sent to the Oak Ridge Operations Office conveying the decision of the Group and asking for a response within 30 days. The memorandum also gave Oak Ridge Operations Office interim authorization to operate during the 30 day time frame. There have been discussions with Oak Ridge Operations Office concerning compliance issues and closure, and the site is in the process of developing a response concerning the compliance issues and closure.

The Low-Level Waste Disposal Facilities Federal Review Group met on July 23 and 24, 1998 at the Savannah River Site to complete its review of the site's composite analysis and determine a course of action with respect to the E-Area Vaults and Saltstone disposal authorization statements. The Group determined that a schedule for a maintenance plan would be requested of the site. The schedule for a maintenance plan would indicate how the performance assessment/composite analysis' technical inadequacies would be addressed by the site. Based on development of an acceptable schedule for a performance assessment/composite analysis maintenance plan, the Group would develop disposal authorization statements basis for the two disposal facilities.

The Nevada Test Site Area 3 review team continues to work on its review of the performance assessment and composite analysis. The review team members have provided input to the team leader who has compiled a draft review team report. The report is currently being reviewed by the team members.

During this reporting period, the Department notified the DNFSB of the receipt of the *Composite Analysis for Low-Level Waste Disposal in the 200 Area Plateau of the Hanford Site* and the *Low-Level Waste Radioactive Waste Management Complex Composite Analysis*. Team leaders have been selected for the review of each of these documents.

During the next reporting period, the Low-Level Waste Disposal Facilities Federal Review Group will continue to work towards making recommendations on the outstanding radiological assessments. There will be discussions with the Savannah River and Oak Ridge Operations Offices regarding the actions and commitments they need to make in response to the Department's memoranda regarding their respective radiological assessments. The Nevada Test Site Area 3 review team will submit its report to the Group which is planning to meet during the next reporting period to complete its review of the Nevada Test Site Area 3 performance assessment and composite analysis. The Group is expected to make a recommendation to the Deputy Assistant Secretary for Waste Management and the Deputy Assistant Secretary for Environmental Restoration regarding acceptance of the radiological assessment and issuance of a disposal authorization statement following the meeting.

4.3 Low-Level Waste Projections

The Department completed the final commitment in the Low-Level Waste Projections task area during this reporting period with the July 17, 1998 transmittal of the *Current and Planned Low-Level Waste Disposal Capacity Report, Revision 1*. This report updates a report prepared two years ago. The current revision projects that the Department has adequate volumetric disposal capacity except for onsite disposal at the Los Alamos National Laboratory. Los Alamos is preparing an environmental impact statement that addresses increasing the disposal capacity at the site and has sufficient capacity for the near term. With the exception of the Savannah River Site Intermediate Level Vaults, the report projects adequate radiological capacity for the waste projected to be disposed at DOE disposal facilities. Although the report indicates a potential problem with radiological capacity for the Intermediate Level Vaults, there are mitigating conditions. First, the conservatism of the analysis and uncertainties associated with the extrapolation of radiological data likely overestimate the dose impact. Inventory controls, design modifications, and waste form changes may be used to ensure that the vaults do not cause an unacceptable dose impact. In addition, the Department appears to have excess capacity at other sites.

4.4 Research and Development

During the current reporting period, the Department completed a document entitled *Complex-Wide Strategy for Maintenance of Department of Energy Low-Level Waste Disposal Facility Performance Assessments and Composite Analyses*. The document describes a strategy for integrating the Headquarters and Field Office activities related to performance assessment and composite analysis maintenance such that research and development needs for low-level waste disposal are addressed. The document lacks a specific implementing process for the strategy which will be prepared before DOE proposes closure of the Research and Development task area.

Appendix

Safety Issues Management System

Report for Recommendation 94-2

July 1 to September 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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Com #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
R94-02	001		The Project Management Plan (PJMP) will be updated to manage the task initiatives and commitments described in this Implementation Plan.	Updated Project Management Plan (PJMP).	IP dated 4/96, Commitment III.C.1, pg. III-9	Complete 6/27/1996	Accepted for closure Conway ltr dated 7/29/98.	06/30/1996
R94-02	002		The Low-Level Waste Management Task Group (LLWMTG) will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Reports.	IP dated 4/96, Commitment III.C.2, pg. III-10	Open		Periodic - Quarterly, 30 days after the end of each calendar year quarter.
R94-02	002	001	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (April-June 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/29/1996	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 11/1/1996		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	Complete 2/7/1997	Ref: EM97-00433	01/31/1997
R94-02	002	004	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (January - March 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 5/1/1997		04/30/1997
R94-02	002	005	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 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/31/1997	Ref: EM97-03482	07/31/1997
R94-02	002	006	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 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 11/21/1997	Ref: Alm/Conway ltr dated 11/21/97.	10/31/1997
R94-02	002	007	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 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 5/21/1998	Ref: Owendoff/Conway ltr dated 5/21/98.	01/31/1998
R94-02	002	008	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	Quarterly Progress Report (January - March 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/9/1998	Ref: Owendoff/Conway ltr dated 7/9/98.	04/30/1998

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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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
R94-02	002	009	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 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/27/1998	Ref: Owendorff/Conway ltr dated 7/27/98.	07/31/1998
R94-02	002	010	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 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Open		10/31/1998
R94-02	003		The Department will complete and document a systems engineering evaluation to accomplish the mission of the LLW program.	DOE LLW management system engineering evaluation report.	IP dated 4/96, Commitment IV.B.1, pg. IV-3	Complete 6/30/1995		06/30/1995
R94-02	004		The Department will complete and document LLW program system requirements including goals and assumptions.	LLW program requirements document.	IP dated 4/96, Commitment IV.B.2, pg. IV-3	Complete 4/26/1996	Accepted for closure. Conway ltr dated 7/29/98.	04/30/1996
R94-02	005		The Department will analyze the requirements to determine what functions (activities) are necessary to accomplish the requirements and identify any additional requirements and functions needed to integrate the program.	LLW system description document.	IP dated 4/96, Commitment IV.B.3, pg. IV-4	Complete 10/7/1996	Deliverable letter of 10/7/96 for the SDD states intent to update the SDD once the Waste Management Order is revised. Accepted for closure Conway ltr dated 7/29/98.	09/30/1996
R94-02	006		A study will be performed to evaluate the safety merits and demerits of using a privately operated facility away from DOE sites for the exclusive disposal of DOE LLW.	Privatization guidelines.	IP dated 4/96, Commitment IV.B.4, pg. IV-4	Complete 10/2/1996	Accepted for closure. Conway ltr dated 7/24/98.	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	Complete 3/31/1997	The PMP includes the guidance and criteria for sites to use when considering disposal options which was specified as part of Task IV.B.4. Accepted for closure Conway ltr dated 7/29/98.	03/31/1997
R94-02	008		A complex-wide corrective action plan will be prepared to correct the vulnerabilities common across the complex.	Initial complex-wide corrective action plan.	IP dated 4/96, Commitment IV.B.6.b.1, pg. IV-6	Complete 7/31/1996		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 7/31/1996		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	Complete membership delivered to the Board in an EM-30 letter dated 3/4/96.	02/29/1996

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Safety Issues Management System
Summary Recommendation Report

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

Board Contact Mr. Steve Stokes

DR Contact Mr. Michael Worley

Rep. Mgr. Mr. Martin Letourneau

p. Org. EM

Case #	Commit #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
14-02	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
14-02	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
14-02	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	CWR results were briefed to the Board on 4/16/96.	05/17/1996
14-02	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
14-02	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	Interim Policy will be prepared by the Low-Level Waste Management Task Group and issued jointly by EM and EH.	07/27/1995
14-02	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
14-02	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	Discussed in meeting with Board Staff on 5/3/96.	05/31/1996
14-02	018		Recognizing that RCRA disposal and storage sites are also regulated by EPA and in some cases the states, a policy and guidance document will be developed to identify the applicable low-level waste requirements for such activities and specify actions necessary to demonstrate protection of human health consistent with the requirements of Order 5820.2A.	Policy and guidance issued for RCRA sites.	IP dated 4/96, Commitment VI.B.3.b.2, pg. VI-7	Complete		12/31/1996
14-02	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		1/9/1997
14-02	020		International efforts such as the IAEA RADWASS program are being considered, along with information specific in the LLW	Report comparing DOE and international requirements and standards.	IP dated 4/96, Commitment VI.B.4.b.1, pg. VI-8	Complete	Report submitted to DNF-SH 19 days early. Accepted for	06/30/1996

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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
			management programs in Canada, the United Kingdom, France, and Sweden, in a report.	standards.	VI.B.4.b.2, pg. VI-8	6/11/1996	closure. Conway Tr dated 7/29/98.	
R94-02	021		The Department will undertake a process to identify essential requirements to be included in the Low Level Waste Chapter of the revised Order on Radioactive Waste Management. A major component of the process will be the development and documentation of the bases for any essential requirements to be incorporated into the Order revision.	Report identifying essential Low-Level Waste Management requirements.	IP dated 4/96, Commitment VI.B.5, pg. VI-8	Complete	Requirements are identified in draft Order 435.1 documents which were sent to the Board on 2/28/97.	02/28/1997
R94-02	022		As part of the identification and development of requirements for LLW management, implementation guidance will be developed, and necessary documentation will be provided in time to support the Radioactive Waste Management Order revision.	Implementation guidance and technical standards to support essential LLW management requirements.	IP dated 4/96, Commitment VI.B.6, pg. VI-10	Complete	Implementation guidance delivered to the Board with draft Order 435.1 on 2/28/97.	02/28/1997
R94-02	023		The approval process for radiological assessments (i.e., performance assessments and composite analyses) will be formalized in order to make the process consistent with the commitments made in this Implementation Plan and will become part of the Order revision for Radioactive Waste Management.	Radiological assessment approval process modified and formally developed for inclusion in Radioactive Waste Management Order revision.	IP dated 4/96, Commitment VI.B.7, pg. VI-10	Complete	Included with draft Order 435.1 documents which were delivered to the Board on 2/28/97. In response to the Board's IP revision acceptance condition, Department diversified the PRP by establishing a federally-staffed group to review the radiological assessments. The Board was notified of these actions in a 4/30/97 letter from EM-1.	02/28/1997
R94-02	024		The Department will issue interim direction addressing the critical aspects of conducting a performance assessment.	Policies addressing critical assumptions and clarifications for performance assessments.	IP dated 4/96, Commitment VII.B.1, pg. VII-5	Complete	Deliverable sent to the Board on 3/7/97 (Ref: EM97-0832). This deliverable was deferred until the end of February consistent with the Order revision effort. A letter to the Board informing them of the deferred delivery was sent on 2/2/97. Ref: EM96-04920.	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
R94-02	026		DOE will prepare a documented description of the process for Headquarter's review of the composite analyses and the criteria for evaluating the acceptability of the analyses.	Description of the process and criteria for Headquarter's review of composite analyses.	IP dated 4/96, Commitment VII.B.3, pg. VII-7	Complete		10/31/1996

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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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
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 10/1/1996		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 11/1/1996	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 October 31, 1998.	10/31/1998
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	Complete 4/3/1997	Ref: EM97-01409.	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	Review completed. Closure letter imminent.	08/31/1998
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 8/30/1996	PRP recommended approval at July meeting. PA accepted with conditions. Accepted for closure. Conway ltr dated 7/29/98.	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	Complete 8/30/1996	PA accepted with conditions. Accepted for closure. Conway ltr dated 7/29/98.	08/31/1996
R94-02	029	005	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance	Submit NTS Area J Radioactive Waste Management Site	IP dated 4/96, Commitment	Complete	Ref: Owendon/Conway ltr dated 5/27/98. Accepted for	03/31/1998

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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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
			with the requirements of the Order.	performance assessment (including composite analysis) to Headquarters for review.	VII.B.5.b.1, pg. VII-9	5/27/1998	closure. Conway ltr dated 7/29/98.	
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	In progress. Review team has completed a site visit and is evaluating the performance assessment and composite analysis.	10/31/1998
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	Complete 9/30/1997	PA submission was reported in a letter to the Board on October 16, 1997.	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	In progress. Review team has completed a site visit and is evaluating the performance assessment.	10/15/1998
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 6/27/1996	Accepted for closure. Conway ltr dated 7/29/98.	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 8/30/1996		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	Complete 6/30/1997	(Ref. EM96-04214) Board was notified of a delay by an EM-1 letter dated 4/30/97 (Ref. EM96-04948). Accepted for closure. Conway ltr dated 7/29/98.	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 additional groundwater analysis information is received and	07/31/1996

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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. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
							closure. Conway ltr dated 7/29/98.	
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 June 30, 2000.	06/30/2000
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	Complete	Ref: EM97-01409	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	Review completed. Closure letter imminent.	08/31/1998
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	In progress. The composite analysis has been delivered to HQ. But not yet accepted by the LFRG.	06/30/1998
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	Pending. Review team and leader will be selected to support review of the document which was delivered in May 1998.	05/15/1999
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	In progress. Work has begun on defining the boundaries of the area to be included in the composite analysis.	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	Pending. Task will start upon receipt of the composite analysis.	06/30/2000
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	Complete	CA submission was reported in a letter to the Board on October 16, 1997.	09/30/1997
						9/30/1997		

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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 Lejourneau

DR Contact Mr. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
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	In progress. Review team has completed a site visit and is evaluating the composite analysis.	10/15/1998
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	In progress. The site submitted the composite analysis to Headquarters in March 1998. DNFSB notification will occur in conjunction with notification of receipt of the Hanford LLW Glass Performance Assessment.	06/30/1998
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	Pending. Review team leader has been selected; review will commence in August 1998.	03/31/1999
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	Complete	CA delivery reported in the quarterly report (cmt#002, act#006). Ref. Owendoff/Conway ltr dated 5/27/98. Accepted for closure. Conway ltr dated 7/29/98.	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	LFRG evaluation of CA is complete. DAS issuance under evaluation.	09/30/1998
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 June 30, 2000.	06/30/2000
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	DAS issuance imminent.	09/30/1998
R94-02	031	002	The complete radiological assessment (e.g., PA and composite analysis) will be reviewed and form the basis for issuance of	Issue disposal authorization statement or direction to resolve	IP dated 4/96, Commitment	Open		05/15/1999

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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 Leloumeau

DR Contact Mr. Michael Worley

Board Contact Mr. Steve Stokes

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
			the disposal authorization statement to document any limits on design or operations for the facility.	issues or concerns for INEL Radioactive Waste Management Complex.	VII.B.5.b.3, pg. VII-9			
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		06/30/2000
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		10/31/1998
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		10/15/1998
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	Pending. Review team leader has been selected; review will commence in August 1998.	03/31/1999
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	Pending. Review team leader has been selected; review will commence in August 1998.	03/31/1999
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	In progress. Review team has completed a site visit and is evaluating the composite analysis.	09/30/1998
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	In progress.	09/30/1998
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	Accepted for closure. Conway ltr dated 7/29/98.	07/31/1996

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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. Michael Worley**

Board Contact **Mr. Steve Stokes**

Rec #	Cmt #	Act #	Commitment Statement	Deliverable	Reference	Complete?	Descriptive Status	Due Date
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, CML VIII.B.1.b.2, pg. VIII-4	Complete 9/17/1998	REF: EM Ltr to Conway on 9/17/98.	08/31/1998
R94-02	034		Based on low-level waste inventory and projections information and the survey of current and planned low-level waste disposal capacity (Task VIII.B.1), a DOE low-level waste projection program will be developed.	DOE Low-Level Waste Projection Program Documentation.	IP dated 4/96, Commitment VIII.B.2, pg. VIII-4	Complete 12/26/1996	Accepted for closure. Conway ltr dated 7/29/98.	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 8/30/1996	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. Accepted for closure. Conway ltr dated 7/29/98.	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 6/30/1995	Revised version was resubmitted along with the needs assessment on 4/18/97. Accepted for closure. Conway ltr dated 7/29/98.	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	Complete 4/18/1997	Ref: EM97-01721 Accepted for closure. Conway ltr dated 7/29/98.	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	Complete 10/1/1998	Ref: EM Ltr to Conway of 10/1/98.	09/30/1998
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	Strategy and implementation process to be developed by 12/31/98.	09/30/1998

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