



Department of Energy

Washington, DC 20585

October 27, 1999

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 the Board Recommendation 94-2, *Conformance with Safety Standards at DOE Low-Level Nuclear Waste and Disposal Sites*, for the period July 1 through September 30, 1999. This 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 the Board Recommendation 94-2.

The Department continues to work aggressively to complete all of the commitments under Recommendation 94-2. The Department is making progress on the completion and approval of the radiological assessments and composite analyses for the Department's disposal facilities. The Low-Level Waste Disposal Facility Federal Review Group (LFRG) continues their review activities for the low-level waste disposal facilities addressed in Recommendation 94-2.

- The Savannah River Site disposal authorization statement for Saltstone and E-Area Vaults was signed and issued on September 28, 1999.
- The disposal authorization statements for the Nevada Test Site Area 3 facility, the Hanford 200 East Area burial grounds, the Hanford 200 West Area burial grounds, the Hanford Immobilized Low-Activity Tank Waste disposal facility and the Oak Ridge SWSA 6 facility are expected to be issued by November 30, 1999.
- The Review Team for the *Idaho Low-Level Waste Radioactive Waste Management Complex Composite Analysis* will meet in Idaho the first week in November 1999. The disposal authorization statement for the facility is expected to be issued by March 31, 2000.

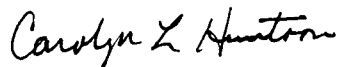
A status table in the quarterly progress report provides the status of all of the Recommendation 94-2 task initiatives. We intend to complete all remaining task initiatives including the radiological assessments and issue Disposal Authorization Statements for all of the Department sites except for the radiological assessment at the Nevada Test Site Area 5 and Idaho National



Engineering and Environmental Laboratory Radioactive Waste Management Complex by the end of November 1999. The Department expects to issue the disposal authorization statement for Nevada Test Site Area 5 by the end of calendar year 2000 and for the Idaho National Engineering and Environmental Laboratory Radioactive Waste Management Complex by March 31, 2000. In light of our progress on completing these items, we have scheduled a briefing with you on November 18, 1999, to discuss closure of Recommendation 94-2.

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

Sincerely,



Carolyn L. Huntoon
Assistant Secretary for
Environmental Management

Enclosure

cc:

Mark B. Whitaker, Jr., S-3.1

Carol Peabody, EM-4

Quarterly Report on the 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, 1999

*Office of Waste Management
U.S. Department of Energy*

1.0 INTRODUCTION

The Department of Energy (DOE) issued the Implementation Plan for Defense Nuclear Facilities Safety Board (DNFSB) Recommendation 94-2, *Conformance with Safety Standards at DOE Low-Level Nuclear Waste and Disposal Sites*, 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 completion dates for the remaining DNFSB 94-2 commitments. 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 for the period July 1 through September 30, 1999 focuses on progress made towards completing the tasks outlined in the Secretary's letter. The attachment provided with this report provides a full report on the status of all of the remaining DNFSB Recommendation 94-2 task initiatives.

2.0 OVERVIEW

2.1 General Progress

During this reporting period the Department completed three commitments and a number of interim activities in support of the remaining commitments in the Implementation Plan.

DOE 435.1, *Radioactive Waste Management, Requirements Manual* (DOE M 435.1), and *Guidance* (DOE G 435.1), replacing DOE Order 5820.2A, were issued on July 9, 1999. A satellite broadcast highlighting the overall changes of the Order, and the roles and responsibilities for implementing the revised requirements occurred on July 13, 1999. A new training course for field personnel on 435.1 implementation was developed in September 1999, and is being implemented.

The Low-Level Waste Disposal Facility Federal Review Group (LFRG), established in December 1996, was chartered to ensure that low-level waste facilities are designed, constructed, operated, and closed in a manner that protects the public and environment. The Low-Level Waste Disposal Facility Federal Review Group and its review teams have made progress in reviewing radiological assessments during the reporting period.

- The Department issued a disposal authorization statement for the Savannah River Site Saltstone and E-Area Vaults on September 28, 1999.
- Significant work was completed on the disposal authorization statements for the Nevada Test Site Area 3 facility, the Hanford 200 East Area burial grounds, the Hanford 200 West Area burial grounds, the Hanford Immobilized Low-Activity Tank Waste disposal facility and the Oak Ridge SWSA 6 facility. The disposal authorization statements are expected to be issued by November 30, 1999.

- The review of the *Idaho Low-Level Waste Radioactive Waste Management Complex Composite Analysis* commenced in September 1999. A site visit is planned for the first week of November 1999. Issuance of the review report is expected by the end of December 1999 and the disposal authorization statement is expected to be issued by March 31, 2000.

2.2 Meetings with the DNFSB and Staff

2.2.1 Meetings During this Reporting Period

DOE held one briefing for the DNFSB staff on August 12, 1999 on the final version of the *Radioactive Waste Management Order* actions taken to implement the low level waste research and development program, and proposed actions to support the closure of Recommendation 94-2, including updates to three guidance documents on performance assessments and composite analyses to reflect issuance of DOE O 435.1.

2.2.2 Meetings in Future Reporting Periods

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

DOE will hold a briefing for the DNFSB on November 18, 1999 on the status of actions to support the closure of Recommendation 94-2.

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

IP Task # SIMS ID #	Title or Description	Due Date	Status
FISCAL YEAR 1998			
VII.B.5.b.2/3 R94-02 031-009	Issue Saltstone disposal authorization statement.	09/30/98	Completed. The disposal authorization statement for Saltstone disposal facility was issued on September 28, 1999.
VII.B.5.b.2/3 R94-02 031-008	Issue E-Area Vaults disposal authorization statement.	09/30/98	Completed. The disposal authorization statement for the E-Area disposal facility was issued on September 28, 1999.
FISCAL YEAR 1999			
VII.B.5.b.1/2/ <u>3</u> R94-02 029-008	Complete Headquarters' review of Oak Ridge Solid Waste Storage Area 6 performance assessment.	10/15/98	In Progress. Expect to issue the disposal authorization statement for SWSA 6 by November 30, 1999.
R94-02 030-008	Complete Headquarters' review of SWSA-6 composite analysis.	10/15/98	
R94-02 031-005	Issue disposal authorization statement.	10/15/98	
VII.B.5.b.1/2/ <u>3</u> R94-02 029-006	Complete Headquarters' review of the Nevada Test Site Area 3 performance assessment/ composite analysis.	10/31/98	In Progress. Expect to issue the disposal authorization statement for Nevada Test Site Area 3 facility by November 30, 1999.
R94-02 031-004	Issue disposal authorization statement.	10/31/98	

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

IP Task # SIMS ID #	Title or Description	Due Date	Status
<p>VII.B.5.b.2 R94-02 030-010</p>	<p>Complete Headquarters' review of Hanford composite analysis; document conclusion relative to Environmental Restoration Disposal Facility.</p>	<p>03/31/99</p>	<p>In Progress. The disposal authorization statement for the Environmental Restoration Disposal Facility will be considered satisfied by the issuance of the Record of Decision and DOE acceptance of a crosswalk demonstrating the requirements of DOE Order 435.1 have been fulfilled. The crosswalk requirement will be included in the disposal authorization statement for the Hanford disposal facilities.</p>
<p>VII.B.5.b.2/3 R94-02 031-006</p>	<p>Issue 200 West Area burial grounds disposal authorization statement.</p>	<p>03/31/99</p>	<p>In Progress. Expect to issue a disposal authorization statement for 200 West Area burial grounds by November 30, 1999.</p>
<p>VII.B.5.b.2/3 R94-02 031-007</p>	<p>Issue 200 East Area burial grounds disposal authorization statement.</p>	<p>03/31/99</p>	<p>In Progress. Expect to issue a disposal authorization statement for 200 East Area burial grounds by November 30, 1999.</p>
<p>VII.B.5.b.2/3 R94-02 030-004 R94-02 031-002</p>	<p>Complete Headquarters' review of Idaho composite analysis. Issue disposal authorization statement.</p>	<p>05/15/99 05/15/99</p>	<p>Pending. Review commenced in September 1999. The site visit is planned for the first week of November 1999. Issuance of the review report is anticipated by the end of December 1999. Issuance of disposal authorization statement is contingent on approval of composite analysis.</p>

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

IP Task # SIMS ID #	Title or Description	Due Date	Status
<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	Pending. Nevada Test Site is awaiting completion of Area 3 PA/CA Review Report before completing the Area 5 composite analysis. Review will start upon receipt of the composite analysis. Issuance of disposal authorization statement is contingent on approval of composite analysis.
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	Disposal authorization statement contingent on approval of composite analysis.

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

Title or Description	Due Date	Status
FISCAL YEAR 1998		
Complete revision of Radioactive Waste Management Order, Manual, and guidance.	09/30/98	Completed. The Order, Manual, and Guidance were issued on July 9, 1999.
FISCAL YEAR 1999		
Complete Headquarters' review of the Hanford LLW Glass Disposal Facility performance assessment and issue disposal authorization statement.	03/31/99	In Progress. The disposal authorization statement for the Immobilization Low-Activity Tank Waste facility is expected to be issued by November 30, 1999.

4.0 TASK AREA STATUS

4.1 Regulatory Structure and Process

DOE 435.1, replacing DOE Order 5820.2A, its Requirements Manual (DOE M 435.1), and Guidance (DOE G 435.1) were issued on July 9, 1999. A satellite broadcast highlighting the overall changes of the order, and the roles and responsibilities for implementing the revised requirements occurred on July 13, 1999. A new training course for field personnel on 435.1 implementation was developed in September 1999, and is being implemented.

The Order states that from the date of issuance, Department programs and sites will have one year to comply with the Order and set up implementation programs and corrective action plans. Any requirements that have not been implemented within a year of issuance of the Order will require the Field Element Manager to obtain a waiver from the cognizant Program Secretarial Officer. All implementation and corrective action plans will be approved by the cognizant managers, as specified in the Order. It is expected that some implementation, such as having radioactive waste management basis statements approved and in place for all facilities, may require up to FY 2001 to complete. By the end of FY 2001, all aspects of the Order are to be fully implemented and completed.

4.2 Radiological Assessments

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

Savannah River Site - The Department issued the disposal authorization statement for the Saltstone and the E-Area Vaults disposal facilities on September 28, 1999.

Oak Ridge National Laboratory - The disposal authorization statement for SWSA 6 is expected to be issued by November 30, 1999.

Nevada Test Site - The disposal authorization statement for Area 3 is expected to be issued by November 30, 1999. Area 5 composite analysis review will start upon receipt of the composite analysis. Issuance of Area 5 disposal authorization statement is contingent on approval of the Area 5 composite analysis.

Hanford Site - The disposal authorization statement for 200 Area East, 200 Area West and Immobilized Low-Activity Tank Waste facility is expected to be issued by November 30, 1999. The disposal authorization statement for the Environmental Restoration Disposal Facility will be considered satisfied by the issuance of the Record of Decision and DOE acceptance of a crosswalk demonstrating the requirements of DOE Order 435.1 have been fulfilled. The crosswalk requirement will be included in the disposal authorization statement for the Hanford disposal facilities.

Idaho National Engineering Environmental Laboratory - The review of the Idaho Low-Level Waste Radioactive Waste Management Complex *Composite Analysis* commenced in September 1999. A site visit is planned for the first week of November 1999. Issuance of the review report is anticipated by the end of December 1999.

APPENDIX

Safety Issues Management System

Report for Recommendation 94-2

July 1 through September 30, 1999

Summary of Recommendation Report(s) - Key Commitment and Action Information

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

Resp. Manager: Mr. Martin Letourneau

Resp. Org: EM

DR Contact: Mr. Joseph Arango

Board Contact: Mr. Dermot Winters

(All completion status commitments)

Total number of records: 86

Current Date: 10/21/99

Rec#	Cmt#	Act#	Responsible Org/Mgr	Commitment Statement	Affected Site	Deliverable	Reference Document	Completion Status	Descriptive Status	Due Date
R94-02	1	0	EM Mr. Martin Letourneau	The Project Management Plan (PjMP) will be updated to manage the task initiatives and commitments described in this Implementation Plan.	HQ	Updated Project Management Plan (PjMP).	IP dated 4/96, Commitment III.C.1, pg. III-9	Complete 6/27/96	Accepted for closure Conway ltr dated 7/29/98.	6/30/96
R94-02	2	0	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Reports.	IP dated 4/96, Commitment III.C.2, pg. III-10	Open		
R94-02	2	1	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (April-June 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/29/96	Quarterly Report for period of April through June 1996 delivered 7/29/96.	7/31/96
R94-02	2	2	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (July-September 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 11/1/96		10/31/96
				The LLWMTG will						

<u>R94-02</u>	2	3	EM Mr. Martin Letourneau	establish a regular report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	HQ	Quarterly Progress Report (October-December 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 2/7/97	Ref: EM97-00433	1/31/97
<u>R94-02</u>	2	4	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report. (January - March 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 5/1/97		4/30/97
<u>R94-02</u>	2	5	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report. (April - June 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/31/97	Ref: EM97-03482	7/31/97
<u>R94-02</u>	2	6	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report. (July - September 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 11/21/97	Ref: Alm/Conway ltr dated 11/21/97.	10/31/97
<u>R94-02</u>	2	7	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (October - December 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 5/21/98	Ref: Owendoff/Conway ltr dated 5/21/98.	1/31/98
				The LLWMTG will establish a regular						

<u>R94-02</u>	2	8	EM Mr. Martin Letourneau	report format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	HQ	Quarterly Progress Report (January - March 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/9/98	Ref: Owendoff/Conway ltr dated 7/9/98.	4/30/98
<u>R94-02</u>	2	9	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (April - June 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/27/98	Ref: Owendoff/Conway ltr dated 7/27/98.	7/31/98
<u>R94-02</u>	2	10	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (July - September 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 10/23/98	Ref: Owendoff/Conway ltr dated 10/23/98.	10/31/98
<u>R94-02</u>	2	11	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (October - December 1998)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 2/1/99	Ref: Owendoff/Conway ltr dated 2/1/99.	1/31/99
<u>R94-02</u>	2	12	EM Mr. Martin Letourneau	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.	HQ	Quarterly Progress Report (January - March 1999)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 4/28/99	Ref: Owendoff/Conway ltr dated 4/28/99.	4/30/99
<u>R94-02</u>	2	13	EM Mr. Martin Letourneau	The LLWMTG will establish a regular report format and provide quarterly reports to the Board on progress on the commitments described	HQ	Quarterly Progress Report (April - June 1999)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 8/27/99	Ref: Huntoon/Conway ltr dated 8/27/99.	7/30/99

R94-02	2	14	EM Mr. Martin Letourneau	in this Implementation Plan. 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.	HQ	Quarterly Progress Report (July - September 1999)	IP dated 4/96, Commitment III.C.2, pg. III-10	Open	10/29/99
R94-02	3	0	EM Mr. Martin Letourneau	The Department will complete and document a systems engineering evaluation to accomplish the mission of the LLW program.	HQ	DOE LLW management system engineering evaluation report.	IP dated 4/96, Commitment IV.B.1, pg. IV-3	Complete 6/30/95	6/30/95
R94-02	4	0	EM Mr. Martin Letourneau	The Department will compile and document LLW program system requirements including goals and assumptions.	HQ	LLW program requirements document.	IP dated 4/96, Commitment IV.B.2, pg. IV-3	Complete 4/26/96	4/30/96
R94-02	5	0	EM Mr. Martin Letourneau	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. 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.	HQ	LLW system description document.	IP dated 4/96, Commitment IV.B.3, pg. IV-4	Complete 10/7/96	9/30/96
R94-02	6	0	EM Mr. Martin Letourneau		HQ	Privatization guidelines.	IP dated 4/96, Commitment IV.B.4, pg. IV-4	Complete 10/2/96	9/30/96
R94-02	7	0	EM Mr. Martin Letourneau	The Department will prepare and maintain a Program Management Plan.	HQ	LLW Program Management Plan.	IP dated 4/96, Commitment IV.B.5, pg. IV-5	Complete 3/31/97	3/31/97

									closure Conway ltr dated 7/29/98.	
<u>R94-02</u>	8	0	EM Mr. Martin Letourneau	A complex-wide corrective action plan will be prepared to correct the vulnerabilities common across the complex.	HQ	Initial complex-wide corrective action plan.	IP dated 4/96, Commitment IV.B.6.b.1, pg. IV-6	Complete 7/31/96		7/31/96
<u>R94-02</u>	9	0	EM Mr. Martin Letourneau	Site-specific corrective action plans prepared as a result of the Complex-Wide Review constitute the initial site improvement activities.	AL, ID, LANL, NV, OR, RF, RL, SR	Initial site-specific corrective action plans.	IP dated 4/96, Commitment IV.B.6.b.2, pg. IV-6	Complete 7/31/96		7/31/96
<u>R94-02</u>	10	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Individuals to staff the Assessment Working Group and Working Group Assessment Teams are assigned.	IP dated 4/96, Commitment V.B.1, pg. V-12	Complete 3/4/96	Complete membership delivered to the Board in an EM-30 letter dated 3/4/96.	2/29/96
<u>R94-02</u>	11	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Completed site surveys.	IP dated 4/96, Commitment V.B.2, pg. V-12	Complete 11/30/95		11/30/95
<u>R94-02</u>	12	0	EM Mr. Martin Letourneau	Independent evaluations are completed for the 38 facilities and an assessment report for these sites is issued.	AL, ID, LANL, NV, OR, RF, RL, SR	Preliminary Report.	IP dated 4/96, Commitment V.B.3, pg. V-12	Complete 4/12/96		4/12/96
<u>R94-02</u>	13	0	EM Mr. Martin Letourneau	Independent evaluations are completed for the 38 facilities and an assessment report for these sites is issued.	AL, ID, LANL, NV, OR, RF, RL, SR	Final Report.	IP dated 4/96, Commitment V.B.3, pg. V-12	Complete 5/17/96	CWR results were briefed to the Board on 4/16/96.	5/17/96
				Issue an Office of						

<u>R94-02</u>	14	0	EM Mr. Martin Letourneau	Waste Management Directive on inclusion of pre-1988 waste and consideration of other sources of radioactive contamination. 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." 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. 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.	AL, ID, LANL, NV, OR, RF, RL, SR	Office of Waste Management Directive.	IP dated 4/96, Commitment VI.B.1, pg. VI-5	Complete 5/31/95	5/31/95
<u>R94-02</u>	15	0	EM Mr. Martin Letourneau		AL, ID, LANL, NV, OR, RF, RL, SR	Interim Policy Statement.	IP dated 4/96, Commitment VI.B.2.b.1, pg. VI-6	Complete 7/21/95	7/21/95
<u>R94-02</u>	16	0	EM Mr. Martin Letourneau		AL, ID, LANL, NV, OR, RF, RL, SR	Revised interim policy statement.	IP dated 4/96, Commitment VI.B.2.b.2, pg. VI-6	Complete 7/31/96	7/31/96
<u>R94-02</u>	17	0	EM Mr. Martin Letourneau		AL, ID, LANL, NV, OR, RF, RL, SR	Policy and guidance document issued for CERCLA sites.	IP dated 4/96, Commitment VI.B.3.b.1, pg. VI-7	Complete 5/31/96	5/31/96
				Recognizing that RCRA disposal and storage sites are also regulated					

R94-02	18	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Policy and guidance issued for RCRA sites.	IP dated 4/96, Commitment VI.B.3.b.2, pg. VI-7	Complete 1/9/97		12/31/96
R94-02	19	0	EM Mr. Martin Letourneau	Complete a report comparing 10 CFR 61 and Agreement State requirements plus license conditions and waste acceptance criteria with those of the Department.	AL, ID, LANL, NV, OR, RF, RL, SR	Report comparing DOE and non-DOE requirements and standards.	IP dated 4/96, Commitment VI.B.4.b.1, pg. VI-8	Complete 12/29/95		12/29/95
R94-02	20	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Report comparing DOE and international requirements and standards.	IP dated 4/96, Commitment VI.B.4.b.2, pg. VI-8	Complete 6/11/96	Report submitted to DNFSB 19 days early. Accepted for closure. Conway ltr dated 7/29/98.	6/30/96
R94-02	21	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Report identifying essential Low-Level Waste Management requirements.	IP dated 4/96, Commitment VI.B.5, pg. VI-8	Complete 2/28/97	Requirements are identified in draft Order 435.1 documents which were sent to the Board on 2/28/97.	2/28/97
				As part of the						

R94-02	22	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Implementation guidance and technical standards to support essential LLW management requirements.	IP dated 4/96, Commitment VI.B.6, pg. VI-10	Complete 2/28/97	Implementation guidance delivered to the Board with draft Order 435.1 on 2/28/97.	2/28/97
R94-02	23	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Radiological assessment approval process modified and formally developed for inclusion in Radioactive Waste Management Order revision.	IP dated 4/96, Commitment VI.B.7, pg. VI-10	Complete 2/28/97	Included with draft Order 435.1 documents which were delivered to the Board on 2/28/97. 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.	2/28/97
R94-02	24	0	EM Mr. Martin Letourneau	The Department will issue interim direction addressing the critical aspects of conducting a performance assessment.	AL, ID, LANL, NV, OR, RF, RL, SR	Policies addressing critical assumptions and clarifications for performance assessments.	IP dated 4/96, Commitment VII.B.1, pg. VII-5	Complete 3/7/97	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.	1/31/97
R94-02	25	0	EM Mr. Martin Letourneau	DOE will prepare and provide to the sites a document providing guidance on the preparation of the composite analyses.	AL, ID, LANL, NV, OR, RF, RL, SR	Guidance for conducting composite analyses.	IP dated 4/96, Commitment VII.B.2, pg. VII-6	Complete 4/30/96		5/31/96
				DOE will prepare a documented description						

R94-02	26	0	EM Mr. Martin Letourneau	of the process for Headquarter's review of the composite analyses and the criteria for evaluating the acceptability of the analyses.	AL, ID, LANL, NV, OR, RF, RL, SR	Description of the process and criteria for Headquarter's review of composite analyses.	IP dated 4/96, Commitment VII.B.3, pg. VII-7	Complete 11/1/96		10/31/96
R94-02	27	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	PA maintenance guidance document.	IP dated 4/96, Commitment VII.B.4.b.1, pg. VII-8	Complete 10/1/96		9/30/96
R94-02	28	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	PA format and content, and standard review plan documents.	IP dated 4/96, Commitment VII.B.4.b.2, pg. VII-8	Complete 11/1/96	In response to the Board's IP revision acceptance condition, completed this deliverable early.	1/31/97
				Sites with LLW disposal facilities		Submit performance				

R94-02	29	0	EM Mr. Martin Letourneau	operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	AL, ID, LANL, NV, OR, RF, RL, SR	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 is expected to be reviewed by October 31, 2000.	10/31/98
R94-02	29	1	EM Mr. William Arthur	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	AL, LANL	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 4/3/97	Ref: EM97-01409.	3/31/97
R94-02	29	2	EM Mr. William Arthur	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	AL, LANL	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	Complete 10/2/98	Ref: EM ltr of 10/2/98	8/31/98
R94-02	29	3	EM Mr. Jerry Lyle	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	ID	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 8/30/96	PRP recommended approval at July meeting. PA accepted with conditions. Accepted for closure. Conway ltr dated 7/29/98.	8/31/96
R94-02	29	4	EM Ms. Leah Dever	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	NV	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 8/30/96	PA accepted with conditions. Accepted for closure. Conway ltr dated 7/29/98.	8/31/96
				Sites with LLW disposal facilities		Submit NTS Area 3				

R94-02	29	5	EM Ms. Leah Dever	operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	NV	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	Complete 5/27/98	Ref. Owendoff/Conway ltr dated 5/27/98. Accepted for closure. Conway ltr dated 7/29/98.	3/31/98
R94-02	29	6	EM Ms. Kathleen Carlson	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	NV	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	The review is complete. A letter to the Board is in review for signature. The review team revised their report and resubmitted to NTS for their review on 6/9/99. NTS reviewed report and provided comments. Final report to LFRG end of July 1999.	10/31/98
R94-02	29	7	EM Mr. R. Nelson	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	OR	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 9/30/97	PA submission was reported in a letter to the Board on October 16, 1997.	9/30/97
R94-02	29	8	EM Mr. R. Nelson	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	OR	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 submitted its report to the LFRG. The LFRG reviewed the report and sent a letter to the site in Aug 98 requesting a plan to address compliance and closure issues. Site response was received 12/30/98. The Disposal Authorization Statement expected to be issued by 11/30/99.	10/15/98
R94-02	29	9	EM Ms. Beth Bilson	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	RL	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 6/27/96	Accepted for closure. Conway ltr dated 7/29/98.	6/30/96
				Sites with LLW disposal facilities						

R94-02	29	10	EM Mr. Jay Augustenborg	operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	RL	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 8/30/96		8/31/96
R94-02	29	11	EM Mr. Jay Augustenborg	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	RL	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 6/30/97	(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.	4/30/97
R94-02	29	12	EM Mr. Lee Watkins	Sites with LLW disposal facilities operating under DOE Order 5820.2A will prepare performance assessments in accordance with the requirements of the Order.	SR	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 7/31/96	PA found technically acceptable except for groundwater analysis - more analysis is being requested. Formal closure with the Board was proposed with the disposal authorization statement deliverable letter. Accepted for closure. Conway ltr dated 7/29/98.	7/31/96
R94-02	30	0	AL Mr. Martin Letourneau	The sites will prepare a composite analysis.	AL, ID, LANL, NV, OR, RF, RL, SR	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.	6/30/00
R94-02	30	1	EM Mr. William Arthur	The sites will prepare a composite analysis.	AL, LANL	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 4/3/97	Ref: EM97-01409	12/31/97
R94-02	30	2	EM Mr. William Arthur	The sites will prepare a composite analysis.	AL, LANL	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	Complete 10/2/98	Ref: EM ltr of 10/2/98	8/31/98
R94-02	30	3	EM Mr. Jerry Lyle	The sites will prepare a composite analysis.	ID	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	Complete 7/10/98	Ref: EM ltr 7/10/98	6/30/98
						Complete the				

R94-02	30	4	EM Mr. Jerry Lyle	The sites will prepare a composite analysis.	ID	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	Review to start in the first quarter, FY00. Team leader selected.	5/15/99
R94-02	30	5	EM Ms. Kathleen Carlson	The sites will prepare a composite analysis.	NV	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. Awaiting completion of Area 3 PA/CA review report expected in October 1999 before completing Area 5 CA.	9/30/99
R94-02	30	6	EM Ms. Kathleen Carlson	The sites will prepare a composite analysis.	NV	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.	6/30/00
R94-02	30	7	EM Mr. R. Nelson	The sites will prepare a composite analysis.	OR	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.	9/30/97
R94-02	30	8	EM Mr. R. Nelson	The sites will prepare a composite analysis.	OR	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 submitted its report to the LFRG. The LFRG reviewed the report and sent a letter to the site in Aug 98 requesting a plan to address compliance and closure issues. Site response was received 12/30/98. The Disposal Authorization Statement expected to be issued by 11/30/99.	10/15/98
R94-02	30	9	EM Ms. Beth Bilson, Mr. Jay Augustenborg	The sites will prepare a composite analysis.	RL	Submit the Hanford 200-E & W Burial Grounds & Restoration Disposal Facility composite analysis to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.2, pg. VII-9	Complete	Ref: EM ltr 7/10/98	6/30/98
									The review is complete. A	

R94-02	30	10	EM Mr. K. Klein, Mr. R. French	The sites will prepare a composite analysis.	RL	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	letter to the Board is in review for signature. Final report sent to RL April 1, 1999. Met with RL on May 10, 1999 and revising the report. Final report to LFRG July 1999. LFRG met on August 16-17, 1999. 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.	3/31/99
R94-02	30	11	EM Mr. Tom Heenan, Mr. Lee Watkins	The sites will prepare a composite analysis.	SR	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.	9/30/97
R94-02	30	12	EM Mr. Tom Heenan, Mr. Lee Watkins	The sites will prepare a composite analysis.	SR	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	Complete	In June 98 the review team submitted its report to the LLWDF LFRG, which evaluated and approved the CA with conditions. Letter sent to SRS on 1/21/99. Received response from SRS on March 9, 1999. LFRG approved the maintenance plan schedule and EM issued the DAS on September 28, 1999.	9/30/98
R94-02	31	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	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		6/30/00
R94-02	31	1	EM Mr. William Arthur	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	AL, LANL	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	Complete	Ref: EM ltr of 10/2/98	9/30/98

R94-02	31	2	EM Mr. Jerry Lyle	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.	ID	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	Expect to issue disposal authorization statement upon completion of review scheduled for first quarter FY00.	5/15/99
R94-02	31	3	EM Ms. Kathleen Carlson	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.	NV	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		6/30/00
R94-02	31	4	EM Ms. Kathleen Carlson	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.	NV	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	Disposal authorization statement has been prepared and is included with a letter to the Board which is in review for signature.	10/31/98
R94-02	31	5	EM Mr. R. Nelson	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.	OR	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	Expect to issue disposal authorization statement by 11/30/99.	10/15/98

R94-02	31	6	EM Ms. Beth Bilson	(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.	RL	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	Expect to issue disposal authorization statement by 10/30/99. Deliverable letter to the Board has been prepared and is in review for signature.	3/31/99
R94-02	31	7	EM Mr. Jay Augustenborg	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.	RL	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	Expect to issue disposal authorization statement by 10/30/99. Deliverable letter to the Board has been prepared and is in review for signature.	3/31/99
R94-02	31	8	EM Mr. Tom Heenan	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.	SR	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	Complete 9/28/99	EM-1 letter to the Board on 9/28/99 provided the approved disposal authorization statement.	9/30/98
R94-02	31	9	EM Mr. Lee Watkins	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.	SR	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	Complete 9/28/99	EM-1 letter to the Board on 9/28/99 provided the approved disposal authorization statement.	9/30/98
				Capacity, as used in this Implementation Plan, addresses the quantity						

<u>R94-02</u>	32	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Low-Level Waste Disposal Capacity Report, Revision 0.	IP dated 4/96, Cmt. VIII.B.1.b.1, pg. VIII-4	Complete 7/31/96	Accepted for closure. Conway ltr dated 7/29/98.	7/31/96
<u>R94-02</u>	33	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Low-Level Waste Disposal Capacity Report, Revision 1.	IP dated 4/96, Cmt. VIII.B.1.b.2, pg. VIII-4	Complete 9/17/98	REF.: EM Ltr to Conway on 9/17/98.	8/31/98
<u>R94-02</u>	34	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	DOE Low-Level Waste Projection Program Documentation.	IP dated 4/96, Commitment VIII.B.2, pg. VIII-4	Complete 12/26/96	Accepted for closure. Conway ltr dated 7/29/98.	12/31/96
<u>R94-02</u>	35	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Evaluation and strategy for improvements to LLW minimization.	IP dated 4/96, Commitment VIII.B.3, pg. VIII-5	Complete 8/30/96	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.	8/31/96

R94-02	36	0	EM Mr. Martin Letourneau	A survey will be conducted to identify those R&D activities where results are applicable to LLW management program improvements. 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. 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.	AL, ID, LANL, NV, OR, RF, RL, SR	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 6/30/95	Revised version was resubmitted along with the needs assessment on 4/18/97. Accepted for closure. Conway ltr dated 7/29/98.	6/30/95
R94-02	37	0	EM Mr. Martin Letourneau		AL, ID, LANL, NV, OR, RF, RL, SR	LLW R&D needs statement.	IP dated 4/96, Commitment IX.B.2, pg. IX-5	Complete 4/18/97	Ref: EM97-01721 Accepted for closure. Conway ltr dated 7/29/98.	3/31/97
R94-02	38	0	EM Mr. Martin Letourneau		AL, ID, LANL, NV, OR, RF, RL, SR	Identification of outstanding R&D needs.	IP dated 4/96, Commitment IX.B.3, pg. IX-5	Complete 10/1/98	Ref.: EM ltr to Conway of 10/1/98.	9/30/98
R94-02	39	0	EM Mr. Martin Letourneau	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.	AL, ID, LANL, NV, OR, RF, RL, SR	Strategy to address outstanding LLW technical and R&D needs.	IP dated 4/96, Commitment IX.B.4, pg. IX-6	Complete 4/14/99	Ref: Owendoff/Conway ltr dated 4/14/99.	9/30/98