

June 2005 P2 Conference Call
16 June 2005

1. Update on Metals EIS and Suspension on the Release of Scrap Metal – Arnie Edelman, SC
 - The Nuclear Regulatory Commission proposed rule on the release of metals from power plants is no longer under consideration. The Commissioners determined that the existing case-by-case release process was working effectively and that the NRC had other more pressing issues to pursue.
 - DOE was interested in the proposed rule as a possible basis for resolving the suspension on the release of scrap metal. The NRC proposed rule might not have been too helpful to DOE because it established a 1mrem/year standard for equivalent use of materials or landfilling. However, in ceasing action on the proposed rule, the Commissioners stated that they believed the 1 mrem was a reasonable standard for free release.
 - The status of the DOE draft metals EIS remains unclear. A decision should be made in July.
 - DOE is in the early stages of developing a free release protocol for uncontaminated materials. Because of the negative reaction to a DOE 2001 proposed release protocol, the protocol under development might include a pilot project. Andy Wallo, EH-41, is the lead for the protocol being developed.

2. Waste Reduction Revitalization II Report – Beverly Whitehead
 - Version II of the report is a compilation of best practices derived from the P2 accomplishments submitted in the 2004 data call, the activities submitted to the White House Closing the Circle Award, and Fed Facts (an EPA publication).
 - The report, along with Version I of the report, will be posted on the P2 website as a searchable database.

3. P2 Agency Goals – Jane Powers
 - The draft new P2 goals will go into the RevCom system as changes to DOE 450.1; the goals appear in Attachment 3 to the Order. There will be a 30-day comment period.
 - Attachment 3 lists strategies for the goals; they are to be treated as mandatory where applicable.

4. P2 Performance Measures – Jane Powers
 - The draft P2 performance measures were sent out 16 June for review. The measures respond to the P2 agency goals, are based on feedback from conference calls, the P2 Workshop, and the P2 goals work group, and reflect the sense that sites will have an EMS and that P2 is integrated at the site through the EMS.
 - Comments on the draft performance measures are due to Jane by Wednesday, 13 July. The July P2 conference call will include a discussion of whether a manual, guidance document, or policy is the best vehicle for issuing the performance measures.
 - Sites would start reporting on their performance on the new P2 goals in October 2006; reporting would be done on-line.
 - The following points were raised in the discussion of the draft performance measures:

- Consider dropping the word “measures” because that word has a contractual connotation. “Indicators” might be a better word since what are being asked for are indicators of P2 progress.
- A single site might have multiple EMSs. Would the site report on each of its EMSs or develop an aggregate report?
- If Order 450.1 is in a contract and the new goals are an Order change, then a change notification to the contractor should be adequate to implement the new goals.
- The draft performance measures focus on the targets and objectives in the site’s EMS. However, it could happen that a site’s targets and objectives don’t match the P2 agency goals.
- The reporting associated with the measures seems to be quite burdensome.
- Performance measures should assess performance not guide/force site performance. The way they are written now, the performance measures could force sites to put PPOAs into their EMSs.
- The draft performance measures don’t measure progress – they measure what you have done rather than the results you have achieved. [Note: Jane pointed out that the measures do ask sites to report on the results of their actions in terms of avoided releases or waste generation, costs avoided, and other benefits).

5. EH Inclusion in Contracting – Beverly Whitehead

- EH is interested in knowing what contracts are coming due so that it can comment on their environmental provisions. The following sites were mentioned: SRS, ANL, Thomas Jefferson, Hanford, West Valley, NTS, and Ashtabula.
- Please notify Beverly with information on any site contracts that might be coming due.

6. LEEDs Training – Arnie Edelman

- The recent 8-hour LEED (Leadership in Energy and Environmental Design) training was very helpful and informative.
- A repeat of the course is possible but would have to be completed by the end of this fiscal year.