



## Department of Energy

Washington, DC 20585

August 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 April 1 through June 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. Subsequent to the completion of the April 1 through June 30, 1999 reporting period, the revised DOE Order 435.1, *Radioactive Waste Management*, was issued on July 9, 1999. A satellite broadcast to all field offices, EM, and other HQ offices highlighting the overall changes of the Order and the roles and responsibilities for implementing the revised requirements occurred on July 13, 1999, as well as a mandatory standdown for all Office of Waste Management employees to ensure appropriate training to the new order. Training at each of the field offices is currently being scheduled.

The Department completed the Low-Level Waste Management Program Research and Development Implementation Plan on April 14, 1999. This document describes the Department's implementation plan to address research and development needs relating to the long term safety and performance of low-level waste disposal facilities and describes how these needs will be met.

The Department is also 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) continue their review activities for the low-level waste disposal facilities addressed in Recommendation 94-2.



The LFRG reviewed the response from the Oak Ridge Operations Office regarding compliance and closure issues of the Solid Waste Storage Area 6 performance assessment and composite analysis in February 1999. On June 15, 1999, the LFRG agreed to acceptable milestones and a schedule for conditional disposal authorization. The disposal authorization is expected to be issued by September 30, 1999.

The Nevada Test Site Area 3 Review Team provided Nevada Operations Office the draft Nevada Test Site Area 3 Radiological Waste Management Site Performance Assessment and Composite Analysis review report on June 8, 1999. The Nevada Operations Office is reviewing the report for factual accuracy. The report was sent to the LFRG on July 31, 1999. The draft review report on the Hanford 200 Area Plateau Composite Analysis and the Immobilized Low-Activity Tank Waste Performance Assessment is complete and was sent to the Hanford Operations Office on April 1, 1999. The Hanford Review Report was also sent to the LFRG on July 31, 1999. The LFRG will meet in August 1999 to discuss the draft Nevada Test Site Area 3 Radiological Waste Management Site Performance Assessment and Composite Analysis review report and the draft review report on the Hanford 200 Area Plateau Composite Analysis and the Immobilized Low-Activity Tank Waste Performance Assessment. The disposal authorization statement for Savannah River Site Area-E Vaults and Saltstone Vaults has been drafted. The disposal authorization statements are expected to be issued by September 30, 1999. The Idaho Low-Level Waste Radioactive Waste Management Complex Composite Analysis review will commence in the fourth quarter of fiscal year 1999.

A status table in the quarterly progress report provides the status of all of the Recommendation 94-2 task initiatives. We intend to complete the radiological assessments and issue disposal authorization statements for all of the Department sites except for the radiological assessment at the Nevada Test Area 5 by the end of December 1999. The Department expects to complete the radiological assessment at the Nevada Test Area 5 by the end of calendar year 2000.

In your letter of May 4, 1999, you identified several guidance documents that needed to be updated, due to the issuance of DOE O 435.1, and the need for further discussion on the Department's Low-level Waste Management Program Research and Development Implementation Plan as being critical to our efforts to complete the commitments under Recommendation 94-2. In anticipation of our continued progress on these items, and completion of the remaining low-level waste disposal facility performance assessments and composite analyses, I plan on scheduling a briefing with the Board in November 1999 to discuss closure of Recommendation 94-2. My staff will coordinate the date of the briefing through S-3.1 staff with your staff.

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*

**April 1 through June 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 April 1 through June 30, 1999 focuses on progress made towards completing the tasks outlined in the Secretary's letter. The attachment provided with this report provides 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 one commitment and a number of interim activities in support of the commitments in the Implementation Plan. The Department completed the *Low-Level Waste Management Program Research and Development Implementation Plan* on April 14, 1999. This document describes the Department's implementation plan to address research and development needs relating to the long term safety and performance of low-level waste disposal facilities and describes how these needs will be met. Implementation Plan task number IX.B.4 (SIMS ID# R94-02 039) is now complete.

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 LFRG and its review teams have made progress in reviewing radiological assessments during the reporting period.

- The LFRG reviewed the Savannah River Site composite analysis report and has approved the composite analysis with conditions. A letter summarizing the conditions was sent to Savannah River Operations Office on January 21, 1999. Savannah River Operations Office provided a maintenance plan schedule on March 9, 1999. The LFRG approved the maintenance plan schedule. The Review Team drafted a disposal authorization statement and have held several conference calls to resolve issues and comments during the reporting period. The disposal authorization statement is expected to be issued by September 30, 1999.
- The LFRG reviewed the response from Oak Ridge Operations Office regarding compliance and closure issues of the Solid Waste Storage Area 6 performance assessment and composite

analysis in February 1999. On June 15, 1999, the LFRG agreed to acceptable milestones and a schedule for conditional disposal authorization. The disposal authorization is expected to be issued by September 30, 1999.

- The Nevada Test Site Area 3 Review Team provided Nevada Operations Office the draft review report on June 8, 1999. Nevada Operations Office is reviewing the report for factual accuracy. The report is expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the review report.
- The Hanford Site *Immobilized Low-Activity Tank Waste Performance Assessment and Hanford 200 Area Plateau Composite Analysis Review Draft Final Report* was sent to the Richland Operations Office on April 1, 1999. The report is expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the review report.
- The Idaho Site review of the Idaho *Low-Level Waste Radioactive Waste Management Complex Composite Analysis* will commence in the fourth quarter of FY 1999.

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

### **2.2.1 Meetings During this Reporting Period**

There were no meetings with the DNFSB and/or staff during the reporting period.

### **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 brief the DNFSB on the final version of the *Radioactive Waste Management Order* and proposed 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 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
<b>FISCAL YEAR 1998</b>			
IX.B.4 R94-02 039	Prepare Strategy to Address LLW R&D Needs.	08/31/98	<b>Completed. The process for implementing the R&amp;D strategy was completed April 14, 1999.</b>
VII.B.5.b.2/3 R94-02 030-012  R94-02 031-009	Complete Headquarters' review of Savannah River Site composite analysis.  Issue Saltstone disposal authorization statement.	09/30/98  09/30/98	Partially Completed. The LFRG has evaluated the report and approved the composite analysis with conditions. A letter summarizing the conditions was sent to SRS on January 21, 1999. SRS provided a maintenance plan schedule on March 9, 1999. The LFRG approved the maintenance plan schedule. <b>A draft disposal authorization statement has been provided to the LFRG for review and comment. The disposal authorization statement is expected to be issued by September 30, 1999.</b>

Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

IP Task # SIMS ID #	Title or Description	Due Date	Status
VII.B.5.b.2/3 R94-02 031-008	Issue E-Area Vaults disposal authorization statement.	09/30/98	In Progress. The LFRG has evaluated the report and approved the composite analysis with conditions. A letter summarizing the conditions was sent to SRS on January 21, 1999. SRS provided a maintenance plan schedule on March 9, 1999. The LFRG approved the maintenance plan schedule. <b>A draft disposal authorization statement has been provided to the LFRG for review and comment. The disposal authorization statement is expected to be issued by September 30, 1999.</b>
<b>FISCAL YEAR 1999</b>			
VII.B.5.b.1/2/ <u>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. <b>The LFRG reviewed the response from Oak Ridge Operations Office regarding compliance and closure issues of the Solid Waste Storage Area 6 performance assessment and composite analysis in February 1999. On June 15, 1999, the LFRG agreed to acceptable milestones and a schedule for conditional disposal authorization. The disposal authorization is expected to be issued by September 30, 1999.</b>



Status of Remaining DNFSB Recommendation 94-2 Task Initiatives

IP Task # SIMS ID #	Title or Description	Due Date	Status
<p>VII.B.5.b.1/2/ 3 R94-02 029-006</p> <p>R94-02 031-004</p>	<p>Complete Headquarters' review of the Nevada Test Site Area 3 performance assessment/ composite analysis.</p> <p>Issue disposal authorization statement.</p>	<p>10/31/98</p> <p>10/31/98</p>	<p><b>In Progress. Review team has completed its review and the draft final review report for the NTS Area 3 RWMS PA/CA was sent to Nevada Operations Office on June 8, 1999 for factual accuracy review. The Review Team Report is expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the Final Review Report. Issuance of disposal authorization statement contingent on approval of NTS Area 3 RWMS PA/CA.</b></p>
<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><b>In Progress. The Hanford 200 Area Plateau Composite Analysis Review Report sent to Richland Operations Office on April 1, 1999. Review Team Report expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the Final Review Report. Issuance of disposal authorization statement contingent on approval of Hanford CA.</b></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>Pending. Dependent on review of Hanford 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.2/3</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  R94-02 031-002	Complete Headquarters' review of Idaho composite analysis.  Issue disposal authorization statement.	05/15/99  05/15/99	Pending. Review is scheduled to commence in the fourth quarter of FY 1999.  Issuance of disposal authorization statement contingent on approval of Composite Analysis.
<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 contingent on approval of Composite Analysis.
<b>FISCAL YEAR 2000</b>			
<u>VII.B.5.b.2/3</u> R94-02 030-006  R94-02 031-003	Complete Headquarters' review of Nevada Test Site Area 5 composite analysis.  Issue disposal authorization statement.	06/30/00  06/30/00	Pending. Task will start upon receipt of the composite analysis.  Disposal authorization statement contingent on approval of CA.

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

Title or Description	Due Date	Status
<b>FISCAL YEAR 1998</b>		
Complete revision of Radioactive Waste Management Order, Manual, and guidance.	09/30/98	In progress. Draft Order, Manual, Guidance and Contractor Requirements Document have been revised based on comments from DNFSB, the Department and the public. The Order is expected to be issued final for implementation by the end of July 1999.
<b>FISCAL YEAR 1999</b>		
Complete Headquarters' review of the Hanford LLW Glass Disposal Facility performance assessment and issue disposal authorization statement.	03/31/99	<b>Immobilization Low-Activity Tank Waste Performance Assessment Review Report and the Hanford 200 Area Plateau Composite Analysis Review Report</b> was sent to Richland Operations Office on April 1, 1999 for review. Review Team Report expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the Final Review Report. Issuance of disposal authorization statement contingent on approval of Hanford PA/CA.

#### **4.0 TASK AREA STATUS**

##### **4.1 Regulatory Structure and Process**

The draft order, DOE O 435.1, *Radioactive Waste Management*, the accompanying Requirements Manual, Implementation Guide, and Technical Basis and Considerations documentation were issued for DOE, DNFSB and staff 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.

Issuance of the final directives for implementation will be discussed in the Quarterly Report for the next reporting period.

##### **4.2 Radiological Assessments**

During the current reporting period, the LFRG 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 LFRG reviewed the Savannah River Site composite analysis report and has approved the composite analysis with conditions. A letter summarizing the conditions was sent to Savannah River Operations Office on January 21, 1999. Savannah River Operations Office provided a maintenance plan schedule on March 9, 1999. The LFRG approved the maintenance plan schedule. The Review Team drafted a disposal authorization statement and have held several conference calls to resolve issues and comments during the reporting period. The disposal authorization statement is expected to be issued by September 30, 1999.

###### ***Oak Ridge National Laboratory***

The LFRG reviewed the response from Oak Ridge Operations Office regarding compliance and closure issues of the Solid Waste Storage Area 6 performance assessment and composite analysis in February 1999. On June 15, 1999, the LFRG agreed to acceptable milestones and a schedule for conditional disposal authorization. The disposal authorization is expected to be issued by September 30, 1999.

###### ***Nevada Test Site***

The Nevada Test Site Area 3 Review Team provided Nevada Operations Office the draft review report on June 8, 1999. Nevada Operations Office is reviewing the report for factual accuracy. The report is expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the review report.

### ***Hanford Site***

The Hanford Site *Immobilized Low-Activity Tank Waste Performance Assessment and Hanford 200 Area Plateau Composite Analysis Review Draft Final Report* was sent to the Richland Operations Office on April 1, 1999. The report is expected to be sent to the LFRG by the end of July 1999. The LFRG will meet in August 1999 to discuss the review report.

### ***Idaho National Engineering Environmental Laboratory***

The Idaho Site review of the Idaho *Low-Level Waste Radioactive Waste Management Complex Composite Analysis* will commence in the fourth quarter of FY 1999.

### ***Future LFRG Activities***

During the next reporting period, the LFRG will continue to work towards making recommendations on the outstanding radiological assessments. There will be discussions with the Nevada, Savannah River, Richland 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 LFRG 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 Savannah River Site E-Area Vaults and Saltstone radiological performance assessments and composite analyses and issuance of disposal authorization statements during the next reporting period.

## **4.3 Research and Development**

The Department completed the Low-Level Waste Management Program Research and Development Implementation Plan on April 14, 1999. This document describes the Department's implementation plan to address research and development needs relating to the long term safety and performance of low-level waste disposal facilities and describes how these needs will be met.

***APPENDIX***

**Safety Issues Management System**

**Report for Recommendation 94-2**

**April 1 through June 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: 85

Current Date: 7/26/99

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	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

R94-02	2	3	EM Mr. Martin L. etourneau	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 (October-December 1996).	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 2/7/97	Ref: EM97-00433	1/31/97
R94-02	2	4	EM Mr. Martin L. etourneau	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 (January - March 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 5/1/97		4/30/97
R94-02	2	5	EM Mr. Martin L. etourneau	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 (April - June 1997)	IP dated 4/96, Commitment III.C.2, pg. III-10	Complete 7/31/97	Ref: EM97-03482	7/31/97
R94-02	2	6	EM Mr. Martin L. etourneau	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 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
R94-02	2	7	EM Mr. Martin L. etourneau	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 (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



<u>R94-02</u>	2	8	EM Mr. Martin Letourneau	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
				The LLWMTG will establish a regular report						

<u>R94-02</u>	2	13	EM Mr. Martin Letourneau	format and provide quarterly reports to the Board on progress on the commitments described in this Implementation Plan.	HQ	Quarterly Progress Report (April - June 1999)	IP dated 4/96, Commitment III.C.2, pg., III-10	Open	The report is being prepared.	7/30/99
<u>R94-02</u>	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
<u>R94-02</u>	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	Accepted for closure. Conway ltr dated 7/29/98.	4/30/96
<u>R94-02</u>	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.	HQ	LLW system description document.	IP dated 4/96, Commitment IV.B.3, pg. IV-4	Complete 10/7/96	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.	9/30/96
<u>R94-02</u>	6	0	EM Mr. Martin Letourneau	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	Privatization guidelines.	IP dated 4/96, Commitment IV.B.4, pg. IV-4	Complete 10/2/96	Accepted for closure. Conway ltr dated 7/24/98.	9/30/96
<u>R94-02</u>	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	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.	3/31/97

R94-02	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
R94-02	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
R94-02	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
R94-02	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
R94-02	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
R94-02	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

<u>R94-02</u>	14	0	EM Mr. Martin Letourneau	Issue an Office of Waste Management Directive on inclusion of pre-1988 waste and consideration of other sources of radioactive contamination.	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	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."	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	Interim Policy will be prepared by the Low-Level Waste Management Task Group and issued jointly by EM and EH.	7/21/95
<u>R94-02</u>	16	0	EM Mr. Martin Letourneau	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.	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	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	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	Discussed in meeting with Board Staff on 5/3/96.	5/31/96

				consistent with the requirements of Order 5820.2A.					
<u>R94-02</u>	18	0	EM Mr. Martin Letourneau	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.	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
<u>R94-02</u>	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
<u>R94-02</u>	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
				The Department will undertake a process to identify essential requirements to be included in the Low Level Waste Chapter of					

R94-02	21	0	EM Mr. Martin Letourneau	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
R94-02	22	0	EM Mr. Martin Letourneau	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.	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
									Deliverable sent to the Board on 3/7/97 (Ref:	

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	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
R94-02	26	0	EM Mr. Martin Letourneau	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.	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
R94-02	29	0	EM Mr. Martin Letourneau	Sites with LLW disposal facilities 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	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 is expected to be reviewed by October 31, 1999.	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
				Sites with LLW disposal						



<u>R94-02</u>	29	2	EM Mr. William Arthur	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
<u>R94-02</u>	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
<u>R94-02</u>	29	4	EM Mr. 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
<u>R94-02</u>	29	5	EM Mr. 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	Submit NTS Area 3 Radioactive Waste Management Site performance assessment (including composite analysis) to Headquarters for review.	IP dated 4/96, Commitment VII.B.5.b.1, pg. VII-9	Complete 5/27/98	Ref. Owendoff/Conway ltr dated 5/27/98. Accepted for closure. Conway ltr dated 7/29/98.	3/31/98
<u>R94-02</u>	29	6	EM Mr. 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 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 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. LFRG review and response expected by July 99.	10/15/98
R94-02	29	9	EM Ms. Linda McClain	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
R94-02	29	10	EM Mr. Charles Hansen	Sites with LLW disposal facilities 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
				Sites with LLW disposal						

R94-02	29	11	EM Mr. Charles Hansen	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 will be proposed when the additional groundwater analysis information is received and reviewed. 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.	6/30/2000
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				

<u>R94-02</u>	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 third quarter, FY99. Team leader selected.	5/15/99
<u>R94-02</u>	30	5	EM Mr. Leah Dever	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 July 1999 before completing Area 5 CA.	9/30/99
<u>R94-02</u>	30	6	EM Mr. Leah Dever	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.	6/30/2000
<u>R94-02</u>	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 9/30/97	CA submission was reported in a letter to the Board on October 16, 1997.	9/30/97
<u>R94-02</u>	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. LFRG review and response expected by July 99.	10/15/98
<u>R94-02</u>	30	9	EM Ms. Linda McClain, Mr. Charles Hansen	The sites will prepare a composite analysis.	RL	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	Complete 7/10/98	Ref: EM ltr 7/10/98	6/30/98
									Pending. Review team	

R94-02	30	10	EM Ms. Linda McClain, Mr. Charles Hansen	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	leader and team members have been selected; review conducted January 11-15, 1999. 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.	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 10/30/97	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 3/9/99	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 will issue a DAS by June 30, 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		6/30/2000
				The complete radiological assessment (e.g., PA and composite						

<u>R94-02</u>	31	1	EM Mr. William Arthur	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, 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 10/2/98	Ref: EM ltr of 10/2/98	9/30/98
<u>R94-02</u>	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		5/15/99
<u>R94-02</u>	31	3	EM Mr. Leah Dever	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		6/30/2000
<u>R94-02</u>	31	4	EM Mr. Leah Dever	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	Expect to issue disposal authorization statement upon completion of PA/CA reviews under commitments 29 and 30.	10/31/98
				The complete radiological assessment						

R94-02	31	5	EM Mr. R. Nelson	(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 upon completion of PA/CA reviews under commitments 29 and 30.	10/15/98
R94-02	31	6	EM Ms. Linda McClain	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-W Burial Grounds.	IP dated 4/96, Commitment VII.B.5.b.3, pg. VII-9	Open	Expect to issue disposal authorization statement upon completion of PA/CA reviews under commitments 29 and 30.	3/31/99
R94-02	31	7	EM Mr. Charles Hansen	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 upon completion of PA/CA reviews under commitments 29 and 30.	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	Open	Expect to issue disposal authorization statement by 7/30/99.	9/30/98
				The complete radiological assessment						

R94-02	31	9	EM Mr. Lee Watkins	(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	Open	Expect to issue disposal authorization statement by 7/30/99.	9/30/98
R94-02	32	0	EM Mr. Martin Letourneau	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.	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
R94-02	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
				Based on low-level waste inventory and projections information						



<u>R94-02</u>	34	0	EM Mr. Martin Letourneau	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
<u>R94-02</u>	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.	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
<u>R94-02</u>	37	0	EM Mr. Martin Letourneau	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.	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
				To evaluate outstanding needs, DOE intends to perform a systematic crosswalk between needs and activities (gap analysis) and use this as						

<p>R94-02</p>	<p>38</p>	<p>0</p>	<p>EM Mr. Martin Letourneau</p>	<p>a screen of the needs identified in task IX.B.2. In cases where R&amp;D needs are being addressed, these will be documented and provided to the LLW management program with recommendations on how to assimilate their results.</p>	<p>AL, ID, LANL, NV, OR, RF, RL, SR</p>	<p>Identification of outstanding R&amp;D needs.</p>	<p>IP dated 4/96, Commitment IX.B.3, pg. IX-5</p>	<p>Complete 10/1/98</p>	<p>Ref.: EM ltr to Conway of 10/1/98.</p>	<p>9/30/98</p>
<p>R94-02</p>	<p>39</p>	<p>0</p>	<p>EM Mr. Martin Letourneau</p>	<p>A comprehensive strategy for meeting outstanding LLW R&amp;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.</p>	<p>AL, ID, LANL, NV, OR, RF, RL, SR</p>	<p>Strategy to address outstanding LLW technical and R&amp;D needs.</p>	<p>IP dated 4/96, Commitment IX.B.4, pg. IX-6</p>	<p>Complete 4/14/99</p>	<p>Ref: Owendoff/Conway ltr dated 4/14/99.</p>	<p>9/30/98</p>