[DOE LETTERHEAD]

May 20, 1996

The Honorable John T. Conway Chairman Defense Nuclear Facilities Safety Board 625 Indiana Avenue, N.W. Suite 700 Washington, D.C. 20004

Dear Mr. Chairman:

Enclosed is the quarterly progress report on implementation of Defense Nuclear Facilities Safety Board Recommendation 94-2 for the period from January 1, 1996, to March 31, 1996.

As discussed in the progress report, the Department has continued to make progress in key task areas, such as the complex-wide review, while focusing on refinement of its projection of the actions and resources-necessary to implement the recommendation as reflected in the revised Implementation Plan submitted to the Board on May 7, 1996.

The body of the progress report contains a status table on the task initiatives that were due during the reporting period. A status table on all of the task initiatives due or completed as of March 31, 1996, is included as an appendix. The dates shown in the "Due Date" column in both tables are those that were projected in the current Implementation Plan. The text and the "Status" column in the tables discusses proposed changes to the due dates for completing these task initiatives, as-described in the revised Implementation Plan. Future progress reports will reference the revised Implementation Plan and the status table will be edited to reflect changes to the description of task initiatives and due dates.

Sincerely,

Stephen P. Cowan Deputy Assistant Secretary for Waste Management Environmental Management Enclosure

Quarterly Report

for

Implementation Plan

Defense Nuclear Facilities Safety Board

Recommendation 94-2

Conformance with Safety Standards at Department of Energy Low-Level Nuclear Waste and Disposal Sites

January 1 through March 31, 1996

1.0 INTRODUCTION

The Department of Energy (DOE) issued the "Implementation Plan, Defense Nuclear Facilities Safety Board Recommendation 94-2" in March 1995. In June, 1995 the Defense Nuclear Facilities Safety Board (DNFSB) sent the Department a letter which conditionally accepted the Implementation Plan.

This is the second report on the status of task initiatives as described in the Implementation Plan that the Department is undertaking to improve its management of low-level waste (LLW). This report covers the period from January 1, 1996 to March 31, 1996.

During the current reporting period DOE has continued to focus its efforts on a revised Implementation Plan, to be submitted to the DNFSB in the next quarter, while making progress in key task areas. The revised Implementation Plan follows the same general approach as the original Implementation Plan, identifying initiatives in six task areas:

- Systems Engineering
- Complex-Wide Review
- Regulatory Structure and Process
- Radiological Assessments
- Low-Level Waste Projections
- Research and Development

2.0 OVERVIEW

2.1 General Progress

During this quarter, significant progress was made on the Complex-Wide Review task initiatives, as discussed below. Resource loading estimates and planning for these initiatives had already been accomplished during the previous quarter. However, for most of the remaining task areas, a significant level of effort continued to be expended to develop a resource loaded schedule. Efforts were made to estimate the resources needed to achieve the task initiatives, and then to determine whether these resources (both in terms of manpower and funding) were available during the dates portrayed in the idealized schedule of the task initiatives. The schedule was then adjusted to reflect the logical relationship of the various tasks. DOE also focused on refining the schedule to dovetail with ongoing efforts to revise the DOE Order on Waste Management (Order 5820.2A).

Although DOE's main focus during this quarter has continued to be the revision of the Implementation Plan, DOE has addressed the task initiatives either in their original or revised form.

Task initiatives under the Complex-Wide Review are almost completed, and it is expected that the Complex-Wide Review Report will be issued in May 1996. Progress on Systems Engineering task initiatives has been steady, with issuance of the requirements document expected next quarter. Several issues in the Regulatory Structure and Process and the Radiological Assessment task areas needed resolution before a resource-loaded schedule and revised Implementation Plan could be developed, these issues have now been resolved. Low Level Waste Projections task initiatives have been delayed due primarily to the late receipt of the Baseline Environmental Management Report (BEMR) data. However a decision has been made to first prepare a volumetric disposal capacity report, followed by a radiological capacity report. A draft of the volumetric capacity report is to be submitted to the DOE HQ and Field staff and the DNFSB staff in May. Research and Development task initiatives have continued to be on hold until the start of fiscal year 1997, consistent with the revised logic reflected in the revision of the Implementation Plan.

2.3 Meetings with the DNFSB and Staff

2.3.1 Meetings During this Reporting Period

There were no meetings with the entire DNFSB during the reporting period.

In this reporting period DOE staff had a number of interactions with staff from the DNFSB to discuss implementation activities and issues as follows:

- DNFSB staff and the DOE staff met on January 16, 1996 to discuss recent revisions to the approach and schedule for conducting the Complex-Wide Review.
- DNFSB staff attended a January 30 to February 1, 1996 workshop on sitewide, allsource terms analyses and meeting on proposed revisions to the Implementation Plan.
- DNFSB staff and DOE staff met on February 9, 1996 to discuss details of the proposed revisions to the Implementation Plan in the area of radiological. assessments.
- DNFSB staff and DOE staff met on February 28 and 29, 1996 at the Fernald site to hear a presentation on the comprehensive risk assessment prepared for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) disposal cell, and to discuss the draft policy on. Order 5820.2A applicability to CERCLA sites, as well as other Radiological Assessment and Regulatory Structure and Process issues.
- DOE staff met with DNFSB staff on March 1, 1996 to discuss the Systems

Engineering requirements review and functional analysis, and the scope of the study of the safety merits and demerits of privatizing LLW disposal.

- DOE, EPA, and NRC staff met on March 14, 1996 to discuss the composite analysis and its performance measures; DNFSB staff also attended the meeting.
- DOE staff and DNFSB staff held a number of status conference calls during the reporting period.

2.3.2 Meetings in Future Reporting Periods

A number of interactions with the DNFSB and staff have occurred since the end of the reporting period, or are expected to occur in the next few months. Those that have occurred at the time of this report or that are tentatively planned are as follows:

- DOE staff briefed the DNFSB members and staff-on April 16, 1996 on the Complex-Wide Review task initiatives.
- DOE staff briefed the DNFSB members and staff on the proposed revision to the Implementation Plan on April 26, 1996.
- DOE staff plan to meet with the DNFSB staff to discuss the Order 5820.2A applicability to CERCLA sites final policy, and to discuss the composite analysis guidance, in May 1996.

3.0 SUMMARY OF COMMITMENTS DUE IN THE CURRENT REPORTING PERIOD

The following table summarizes the status of commitments that were due to be completed during the current reporting period. Appendix A provides a listing of all task initiatives that were due or completed as of the end of this reporting period. Two indicators are provided in the first column of the table. The first correlates with the commitment as numbered in the Implementation Plan. The second number corresponds to the numbering system used by the Department's Safety Issues Management System (SIMS). Dates reported in the "Status" column reflect the completion dates that will be proposed in the revised Implementation Plan.

Status of Task	Initiatives	Due January	v 1 -	· March	31. 1996
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IP Task #	Title or Description	Due Date	Status
SIMS ID #			
IV.C.1 R94-02 021	Evaluation of Privatization.	3/31/96	Delayed. DOE's understanding of this initiative has changed since its conception. Projected to be issued 09/30/96.
V.B.3 R94-02 001	Conduct first priority on- site independent assessments.	03/31/96	Ongoing. A preliminary complex-wide review assessment report was delivered to the DNFSB on April 12, 1996 and is being finalized. The final report is projected to be issued 05/17/96.

VII.B.2.b.2 R94-02 024	Conduct preliminary assessments and develop corrective action plans.		Suspended. Consistent with the DNFSB letter of June 1995, this task is being deleted in the revised Implementation Plan.
VIII .B.2 R94-02 006	Complete DOE LLW Projections Program Documentation.	02/28/96	Ongoing. Project issuing final document 12/31/96.
VIII.B.3.a R94-02 032	Develop LLW Minimization Strategy.	03/31/96	Ongoing. Project issuing final document 08/31/96.
IX.B.2.b.2 R94-02 018	Issue final LLN R&D needs statement.	03/31/96	Suspended. R&D activities to be resumed in FY 97. Propose issuing a single R&D needs statement.
IX.B.4.b.1 R94-02. 020.001	Recommended strategy for initial Board identified R&D needs.	01/31/96	Suspended. R&D activities to be resumed in FY 97. Propose a single R&D strategy be prepared.

4.0 TASK AREA STATUS

4.1 Systems Engineering

During this reporting period, the initial review of the system requirements document and resolution of comments and issues raised took place. A video conference was convened on March 27 and 28 with DOE Field Office representatives. Plans for finalizing the system requirements were also discussed. The task of allocating (assigning) requirements to system functions was initiated during this quarter.

The Evaluation of Privatization task initiative was to be completed during this quarter. However, DOE's understanding of the initiative has changed since it was first proposed and its projected completion date is now September 30, 1996. The scope of the initiative will include privately operated, non-LLW compact disposal facilities at or away from a DOE site.

During the next reporting period, the systems requirements document will be issued. No other Systems Engineering tasks are expected to come to completion during the next quarter. Following completion of the system requirements document, DOE is planning to prepare a systems description document which will be developed with one or more workshops with the Field Offices. The first workshop is tentatively scheduled for mid-May 1996. The system description document will include the allocation of the requirements to system functions, an effort that was initiated during the current reporting period. It will focus on the major functions and interfaces of the system: generation, treatment, storage, and disposal. The system description document will establish the technical scope, or baseline, for the LLW Program Management Plan.

After the Complex-Wide Review Report is finalized (see 4.2) site-specific and complex-wide corrective action plans will be prepared. A memorandum providing direction on the preparation of the corrective action plans will be prepared and distributed to-the Field Offices.

4.2 Complex-Wide Review (CWR)

During the current reporting period, the process of staffing the Working Group Assessment Teams (WGATs) was completed. WGAT nominees were identified, and the Assessment Working Group (AWG) reviewed information provided by the nominees in order to make recommendations on team assignments.

Key elements of the analysis methodology for conducting the CWR were finalized. This effort included-developing a working definition for an "environmental, safety, and health vulnerability." The definition is intended to identify physical as-well as programmatic vulnerabilities. Work on the development of the Assessment Plan to review the survey responses and to -conduct the independent on-site assessments was completed. This work included the development of review approaches and the methodology to identify and prioritize vulnerabilities. The Assessment Plan was used by the WGATs to continue the analysis initiated through implementation of the survey. Additional accomplishments achieved during the reporting period include the following:

- completion of onsite reviews of ten active LLW generator, and active or planned treatment, storage and disposal facilities;
- completion of HQ off-site assessments of 28 active LLW generator, and active or planned treatment and storage facilities, and past LLW disposal facilities; and
- preparation of the preliminary Complex-Wide Review Report for DOE and DNFSB review.

During the next reporting period, the final Complex-Wide Review Report will be issued to the DNFSB.

4.3 Regulatory Structure and Process

Efforts during the quarter covered by this report focused on preparing documents which address LLW requirements, which in turn support the revision of Order 5820.2A. The following documents were prepared:

- A draft Report "Comparison of Low-Level Waste Disposal Programs of DOE and Selected International Countries" was prepared and peer reviewed. The report provides discussions and tables comparing selected DOE LLW management requirements, practices, and standards with those of Sweden, the United Kingdom, France, and Canada.
- A Draft Report "Standard Format and Content Guide for U.S. Department of Energy Low-Level Waste Performance Assessments," and outlines for the "Standard Review Plan for U.S. Department of Energy Low-Level Waste Performance Assessments" and the "Maintenance of U.S. Department of Energy Low-Level Waste Performance Assessments" were reviewed.
- A first and second draft of the policy (and guidance) on applicability of Order 5820.2A to CERCLA sites was prepared.

The primary issue facing the Regulatory Structure and Process tasks throughout the previous reporting period was the proper interface and coordination with the revision of DOE Order

5820.2A, *Radioactive Waste Management*. This issue was clarified during this quarter by plans and schedules established for the revision of the Order. Tasks are described in the revised Implementation Plan that will result in a coordinated effort to revise the Order to include the results of analysis and technical findings of the 94-2 effort.

Accomplishments projected for the next reporting period include:

- Implementation Guidance for the applicability of DOE Order 5820.2A to CERCLA sites along with a technical justification document supporting the guidance will be issued. The Guidance will clarify the actions needed to ensure that DOE Order 5820.2A is being met for LLW disposal facilities established under CERCLA.
- A working group will be established that will formulate the requirements and implementation guidance that is needed prior to the development of the LLW Chapter of the revision to the Order.
- The "Comparison of Low-Level Waste Disposal Programs of DOE and Selected International Countries" Report will be finalized.

4.4 Radiological Assessments

The Department is proposing in the revised Implementation Plan to prepare three related documents as part of each disposal site's radiological assessment: (1) the performance assessment or CERCLA/RCRA documentation, as appropriate, (2) the composite analysis, and (3) the disposal authorization statement. The performance assessment (or CERCLA/RCRA documentation is a tool to be used in designing a disposal facility and justifying the operational constraints (e.g., waste acceptance criteria). The composite analysis is a separate assessment of the impacts of other sources of radioactive material (past disposal sites, spills, etc.) that contribute to the projected radiological dose to an offsite member of the public from an active or planned LLW disposal facility. The composite analysis would be prepared to demonstrate that the potential dose to a person at the point of public access, the land-use boundary, would not exceed a specified limit. The disposal authorization statement is the authorization for the facility to operate under the conditions that are described in the performance assessment (or CERCLA/RCRA documentation) and composite analysis.

During the period covered by this report, a series of meetings were held to assist in further refining DOE's understanding of the composite analysis. A workshop was held January 30-31 at which presentations were given that covered the scope and purpose of the composite analysis, definitions and approaches to the interacting source term and all source term analysis, the International Commission on Radiological Protection (ICRP) radiation protection system the programmatic environmental impact statement (PEIS) experience with all-source term analysis, land use planning, 10 CFR 834 (DOE's proposed rule for Radiation Protection of the Public and the Environment), and the status of related task initiatives in the Implementation Plan.

During the workshop, site-specific approaches to interacting source term and all source terms analyses were presented by Savannah River, Hanford, Oak Ridge, Los Alamos, Idaho National Engineering Laboratory, and Nevada Test Site. The interchange of information between HQ and the Field and between the Offices of Waste Management (EM-30), Environmental Restoration (EM-40), and Environment, Safety and Health (EH) was quite

valuable. A clearer understanding was reached on EM-40's approach to CERCLA LLN disposal, and on EH's approach to public protection and the appropriate dose limits and points of application for interacting and all source term analyses. The discussions clarified the technical issues associated with each site, including the availability of data, the basic factors impacting radionuclide transport, and the sites-initial technical approach to all source term analysis.

A meeting, attended by DNFSB staff, was held on March 14 with staff from EPA and NRC to elicit comments on the composite analysis process and the associated performance measures. In general, the staff in attendance was supportive of DOE's approach to interacting source term analysis. A senior DOE management meeting was also held to discuss whether the correct radiological principles were being used in the draft Composite Analysis Guidance document. Based on the EPA and NRC meeting and senior DOE management review, the approach proposed for the composite analysis was confirmed as correct.

The draft Composite Analysis Guidance document underwent a second review by DOE Headquarters and field organizations. The authors of the guidance resolved the comments received and prepared the document for final approval.

The Peer Review Panel met on March 26 - 28, 1996 to conduct a preliminary review of the draft Hanford 200-East performance assessment and to continue the review of the Nevada Test Site Area 5 performance assessment. A report has been issued on the preliminary review of the Hanford 200-East performance assessment to guide its completion. The review of the Nevada Test Site Area 5 performance assessment was not concluded. The Peer Review Panel has made a second request for information on the impacts of trench subsidence on the performance of the Area 5 disposal facility.

During the next reporting period, the Nevada Test Site personnel will work on developing information necessary for the Peer Review Panel to complete its technical review of the Area 5 performance assessment. Hanford Site personnel will continue their work on completing the analyses, including consideration of the Peer Review Panel comments and preparing a performance assessment of the Hanford 200 East Area Burial Grounds. There are two performance assessment task initiatives in the revised Implementation Plan that are projected for completion during the next quarter:

- Issue final Composite Analysis Guidance to the Field Offices for their use (05/31/96).
- Issue HQ conditional approval of the Hanford 200-West Area Burial Grounds performance assessment (post-88 waste only) (06/30/96).

4.5 Low Level Waste Projections

The Low Level Haste Projections tasks are intended to coordinate with other efforts to collect waste information from the DOE sites. The Disposal Capacity Report was delayed-during the previous reporting period by the late receipt of the Baseline Environmental Management Report (BEMR) data on which it is based. During the current reporting period, the disposal cell summaries were combined with data received from the field, data analyses were performed and the majority of the Disposal Capacity Report was written.

Two other task initiatives, the LLN Projection Program and the LLN Minimization Strategy, were due for completion in this quarter. As proposed in the revised Implementation Plan, the Minimization Strategy will be issued in August 1996 and the LLW Projection Program document will follow Rev. O of the Disposal Capacity Report, in December 1996.

During the next reporting period, the first draft of the Disposal Capacity Report will be sent to DOE HQ and Field staff and the DNFSB staff for review. The Report will then be revised for issuance, projected to be July 31, 1996. As proposed in the revised Implementation Plan, subsequent reports will be prepared that will also address radiological constraints on capacity. Data on radiological capacity will be obtained from performance assessments and composite analyses conducted by the sites.

4.6 Research and Development

Personnel responsible for these task tnitiatives have determined that a number of other activities being conducted as part of the Implementation Plan (such as the Complex-Wide Review, Systems Engineering, and Radiological Assessments) should be completed or further developed to support identification of Research and Development needs and to develop needs statements. This approach has resulted in suspension of active work in this task area during the remainder of this fiscal year. Fiscal year 1996 research and development activities being conducted by the Office of Science and Technology, particularly the Mixed Waste Focus Area and the Subsurface Contaminants Focus Area, will be monitored throughout the year and factored into the identification of outstanding needs.

IP Task # SIMS ID #	Title or Description	Due Date	Status
	Prepare a Project Management Plan	06/30/95	Completed.
IV.B.1 R94-02 030.001	Prepare DOE LLW management system evaluation report.	06/30/95	Completed. Report transmitted to DNFSB 06/28/95.
IV.B.2 R94-02 030.002	Prepare LLW Management Program Strategic Plan	09/30/95	Deferred. Will be included as part of the Program Management Plan.
IV.B.3 R94-02 030.003	Prepare LLW management system requirements document.	12/31/95	Ongoing. Final Field issues resolved during video conference on 3/27 - 3/28/96. Document to be issued by 4/30/96.
IV.C.1	Evaluation of	03/31/96	Delayed. DOE's understanding of this

APPENDIX A:

R94-02, 021	Privatization.	initiative has changed since its conception. Projected to be issued 09/30/96.
V.B.1 R94-02 001.001	Identify personnel tostaff 07/31/9 Complex-Wide Review efforts.	5 Completed. Assessment Working Group and Site Assessment Teams formed. Working Group Assessment Teams were finalized 02/29/96.
V.B.2 R94-02 001.002	Submit site surveys to 08/31/9 Assessment Working Group.	5 Completed. Surveys needed to support reviews were received by 11/30/95.

APPENDIX A: Status of Task Initiatives Due or Completed as of March 31, 1996

IP Task # SIMS ID #	Title or Description	Due Date	Status
V.B.3 R94-02, 001	Conduct first priority on-site independent assessments.	03/31/96	Completed. A complex-wide review assessment report is being finalized. Projected to be issued 05/17/96.
VI.B.1 R94-02 007	Issue directive to include pre- 1988 source terms in performance assessments.	05/31/95	Completed. Directive issued to Operations Offices on 05/31/95.
IV.B.2 R94-02 008	Issue policy clarify/strengthen LLW regulatory structure.	05/31/95	Completed. Interim policy issued 07/21/95 describing responsibilities and process for performance assessment (PA) approval.
VI.B.3.b.1 R94-02 010	Publish guidance documents addressing critical assumptions for performance assessments (PAs).	08/31/95	Ongoing. The critical assumptions are being addressed through four policy papers; projected to be complete 01/31/97.
VI.B.4 R94-02, 014	Issue interim guidance on applicability of 5820.2A to RCRA/CERCLA sites.	09/30/95	Ongoing. Preliminary analyses have been prepared for CERCLA sites. Project issuing CERCLA policy and guidance 05/31/96; RCRA policy and guidance 12/31/96.
VI.B.5.b.I R94-02 011	Diversify roster of Peer Review Panel.	09/30/95	Deferred. Will be included as part of final regulatory structure policy.

APPENDIX A:

IP Task # SIMS ID #	Title or Description	Due Date	Status
V.B.6 R94-02 013.001	Issue report comparing DOE and non-DOE LLW requirements and standards.	09/30/95	Partially completed. Report comparing U.S. requirements issued 12/28/95. Comparison to selected foreign requirements projected for 06/30/96.
VI.B.7.b.1 R94-02 013.002	I Issue interim implementation guidance on selected LLW functions.		Proposed deleting activity as part of IP revision.
VII.B.1 R94-02 022	HQ conditionally approve Hanford Grout PA (post-88 waste only).		Suspended. The Grout Program has been suspended Vitrification is being considered for treatment and disposal of this waste.
VII.B.1 R94-02 022	HQ conditionally approve Hanford 200-W PA (post-88 waste only).		Ongoing. In the revised IP, the performance assessment (PA) is projected for 06/30/96, the composite analysis (CA) is included with the ERDF CA, and the disposal authorization statement (DAS) is projected for 06/30/98.
VII.B.1 R94-02 022	Submit Hanford ERDF PA (post-88 waste only) to HQ.	08/31/95	Ongoing. CERCLA assessment has been completed. In the revised IP, the CA is projected for 05/31/98.

APPENDIX A:

IP Task # SIMS ID #	Title or Description	Due Date	Status
VII.B.1 R94-02 022	HQ conditionally approve INEL PA (post- 88 waste only).	08/31/95	Ongoing. In the revised IP, the PA is projected for 08/31/96, the CA for 04/30/98, and DAS for 05/31/98.
VII.B.1 R94-02 022	HQ conditionally approve NTS Area 5 PA (post-88 waste only) to HQ.	12/30/95	Ongoing. In the revised IP, the revised PA is projected for 08/31/96, the CA for 12/31/99, and DAS for 01/31/00.
VII.B.1 R94-02 022	HQ conditionally approve ORNL SWSA-6 (post-88 waste only).	06/30/95	Partially completed. In the revised IP, the revised PA is projected for 01/21/98, the CA for 12/31/97, and DAS for 06/30/98.
VII.B.1 R94-02 022	HQ conditionally approve Saltstone PA (post-88 waste only).	05/31/95	Ongoing. In the revised IP, the PA is projected for 07/31/96, the CA is proposed for inclusion in the E-Area Vault CA (12/31/97), and DAS projected for 03/31/98.
VII.B.2.b.1	Prepare guidance for	07/31/95	Suspended. Guidance is being redirected

towards composite analysis; project completion 05/31/96.

APPENDIX A:

IP Task # SIMS ID #	Title or Description	Due Date	Status
VII.B.2.b.2 R94-02 024	2 Conduct preliminary assessments and develop corrective action plans.	03/31/96	Suspended. Consistent with the DNFSB letter of June 1995, this task is being deleted in the revised IP.
VIII.B.1 R94-02 004	Issue LLW disposal capacity survey report.	09/30/95	Ongoing. Project issuing volumetric capacity report, rev. 0, 07/31/96.
VIII.B.2 R94-02 006	Complete DOE LLW Projections Program Documentation.	02/28/96	Ongoing. Project issuing final document 12/31/96.
VIII.B.3.a R94-02 032	Develop LLW Minimization Strategy.	03/31/96	Ongoing. Project issuing final document 08/31/96.
IX.B.1.b.1 R94-02 016.001	Issue preliminary LLW R&D activities catalog of needs from DNFSB.	06/30/95	Completed. Report transmitted to DNFSB 06/30/95.
IX.B.1.b.2 R94-02 016	Issue R&D catalog of additional LLW activities.	12/31/95	Suspended. R&D activities to be resumed in FY97. Propose making it part of other R&D tasks.
IX.B.2.b.1 R94-02 018.001	Issue initial LLW R&D needs statement.	09/30/95	Suspended. R&D activities to be resumed in FY 97. Propose issuing a single R&D needs statement.
IX.B.2.b.2 R94-02 018	Issue final LLW R&D needs statement.	03/31/96	Suspended. R&D activities to be resumed in FY 97. Propose issuing a single R&D needs statement.
IX.B.3.b.1 R94-02. 019.001	Correlate initial needs with catalogued activities.	11/30/95	Suspended. R&D activities to be resumed in FY 97. Propose a single correlation activity.
IX.B.4.b.1 R94-02. 020.001	Recommended strategy for initial Board identified R&D needs.	01/31/96	Suspended. R&D activities to be resumed in FY 97. Propose a single R&D strategy be prepared.