

MEMORANDUM TO: George G. Beveridge, Chief
Resource Management Branch
Program Management, Policy Development
and Analysis Staff, NMSS

November 11, 1994

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FROM: Margaret V. Federline, Chief
Performance Assessment & Hydrology Branch
Division of Waste Management

SUBJECT: NEED FOR ADDITIONAL FUNDING FOR CNWRA LLW AND SDMP PA WORK

The purpose of this memo is to request \$300K to support Division of Waste Management (DWM) low-level waste (LLW) and Site Decommissioning Management Plan (SDMP) performance assessment (PA) activities at the Center for Nuclear Waste Regulatory Analyses (CNWRA).

The objectives of the CNWRA efforts are to: (1) develop and sustain a capability to support NRC in implementing its roles and responsibilities as defined in the Low-Level Waste Policy Act of 1980, the Low-Level Waste Policy Amendments Act of 1985, and the Atomic Energy Act of 1954, as amended by the Energy Reorganization Act of 1974; and (2) ensure appropriate consistency in approach for high-level waste (HLW), LLW and decommissioning PA activities. The major activities supporting these objectives are: (1) develop and sustain a capability to review and evaluate LLW PA's, including conducting confirmatory PA analyses; (2) assist the NRC staff in the development of a strategy for evaluating Site Decommissioning Management Plan (SDMP) sites that may not be released for unrestricted use; (3) perform PA analyses on SDMP sites, including supporting analyses associated with the preparation of environmental assessments (EA's) and/or environmental impact statements (EIS's); and (4) identify and develop a range of models and computer codes which can be used in evaluating impacts needed for the development of an EA and/or an EIS.

The FY95 budget was reviewed to identify potential resources available for completing the above noted activities. It has been determined that all money in the FY95 budget will be committed for other activities, and therefore, is not available to conduct these PA activities at the CNWRA. It should be noted, that the FY95 budget does not include resources for performance assessments of any SDMP sites. However, there are several SDMP site reviews which require PA support in FY95.

The Division of Waste Management has closely reviewed the work activities of current PA contractors to assure that duplication with the activities of the CNWRA is minimized. In the near term, the existing PA contractors will focus on assisting the NRC staff in reviewing and completing the LLW branch technical position and test case, including review of external comments. The CNWRA will assist the staff in developing a PA strategy and methodology for evaluating SDMP sites. The Division plans to phase LLW and SDMP PA work to the CNWRA by the end of 1997 to ensure consistency in approach for HLW, LLW, and decommissioning activities. Oak Ridge National Laboratory will continue to work on SDMP EIS's complemented by NRC staff and CNWRA PA's.

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