

Official Transcript of Proceedings
NUCLEAR REGULATORY COMMISSION

Title: Public Meeting Saltstone Disposal Facility

Docket Number: (n/a)

Location: Aiken, South Carolina

Date: Thursday, January 27, 2011

Work Order No.: NRC-684

Pages 1-67

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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PUBLIC MEETING TO DISCUSS
STATUS OF US NUCLEAR REGULATORY
COMMISSION MONITORING ACTIVITIES
AT THE SALTSTONE DISPOSAL
FACILITY AT SAVANNAH RIVER SITE

Thursday, January 27, 2011

Large Meeting/Conference Room
Aiken Municipal Center
215 The Alley
Aiken, South Carolina

The above-entitled hearing was conducted
at 6:08 p.m.

BEFORE: Nishka Devaser, Moderator

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P R O C E E D I N G S

1
2 MR. DEVASER: My name is Nishka Devaser.
3 I work for the Nuclear Regulatory Commission. The
4 purpose of the meeting tonight -- well, it's a
5 Category 2 meeting, NRC Category 2 meeting, which
6 means that the members of the public are going to have
7 specific chances to make comments and ask questions
8 after each presentation, after -- DOE's providing two
9 presentations, and NRC's providing one.

10 The purpose of the meeting of the tonight
11 is to discuss monitoring activities at Saltstone. If
12 I could remind everyone to sign in at the sign-in
13 sheet at the back. In addition, should you feel
14 inclined, there's an NRC public meeting feedback form,
15 just how you felt about the meeting, how it was run,
16 things like that. Feel free. We appreciate it.

17 In addition, at the back of the room we
18 have agendas for the meeting. We have the -- each
19 agency's presentations, we have a glossary of terms
20 that we typically use, and we have a list of important
21 documents and a means of accessing those documents.

22 One additional note is we're having this
23 meeting transcribed. As a result, we -- the
24 microphone situation is any speaker needs to stand at
25 the podium. I know we have some mobile speakers here,

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1 so bear with me here. Sorry about that. And anyone
2 asking a question or responding to a question needs to
3 be at either that microphone or this microphone, and
4 there's one at the center of the room.

5 So with that, I can open up to the first
6 speaker, who's going to be George Alexander, NRC.
7 Thank you.

8 MR. ALEXANDER: All right. Thank you for
9 joining us here this evening. We just want to take a
10 little bit of time and go through a discussion on the
11 review status of the 2009 Saltstone performance
12 assessment.

13 So in regards to an outline, we're just
14 going to walk through the NDAA history of Saltstone,
15 the current Saltstone PA review, which incorporates
16 some new DOE research, some of the model assumptions,
17 and some of our concerns with those assumptions in
18 regards to the base case as well as looking at some
19 alternative analyses, and then a summary.

20 So starting off with the history of the
21 Saltstone project -- and it's easier if I don't look
22 at the screen the whole time. In 2005 the NRC
23 reviewed DOE's performance assessment, which
24 identified numerous key assumptions and certain
25 uncertainties, and the TER that was concluded in 2005

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1 concluded that the performance objectives could be met
2 if certain key assumptions were shown to be valid in
3 monitoring.

4 Since that time, DOE has conducted
5 additional research, and NRC has reviewed that
6 additional research as that has been made available to
7 us, and that additional research as well as recent
8 observations and new vault designs have been
9 incorporated into a new PA, and NRC has been reviewing
10 that PA since 2009.

11 So also in regards to the history of the
12 Saltstone project, the monitoring plan discussed eight
13 key factors that were important towards assessing
14 compliance, and in general these relate to the waste
15 form and vault degradation, the effectiveness of
16 infiltration and erosion control -- I guess that's not
17 going to work -- as well as estimation of the
18 estimation of the radiological inventory.

19 Also in terms of a time line, as I
20 mentioned, in 2005 we submitted a technical evaluation
21 report, we identified certain open issues in 2009
22 through -- from 2007 through 2009. In August of 2009,
23 NRC observed the DOE LFRG review of the Saltstone PA,
24 then this April we submitted a request for additional
25 information.

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1 We had the DOE responses in July, we had a
2 phone call in September, and we recently submitted an
3 additional round of -- addition requests for
4 additional information in December, this past
5 December.

6 So some of the key points on the NRC
7 review of the 2009 PA, it was looking at the
8 integration of the new data that was incorporated into
9 that PA, it was a risk informed review that focused on
10 those key factors, as well as updated information from
11 monitoring.

12 The review was primarily focused on the
13 base case; however, we also looked at several
14 alternative analyses, and as I mentioned, the request
15 for additional information, the first round was in
16 April and then we recently submitted a second round in
17 2010, and that's pending currently.

18 So some of the additional research that
19 has come. Our 2005 concluded that we'd have
20 reasonable assurances if key assumptions were shown to
21 be valid during monitoring. Since that time,
22 additional research has come in certain areas that
23 I'll discuss in more detail, including the hydraulic
24 properties of Saltstone, the physical integrity of
25 Saltstone, the fracturing of vault walls, the

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1 reduction and retention of technetium at Saltstone, as
2 well as some inventory changes.

3 In addition to some of the new research,
4 we had some questions in regards to some research
5 quality in regards to the experimental data and the
6 references. I apologize if the font is a little bit
7 small. Some of our questions and comments on that,
8 the first one is in regards to the experimental
9 conditions. Sometimes they're inconsistent with site
10 conditions.

11 For instance the hydraulic conductivity
12 that was used in the Saltstone performance assessment
13 for Saltstone was based on laboratory samples and may
14 not incorporate all for the uncertainty when you go
15 from the laboratory towards field conditions, which
16 I'll explain in more detail.

17 There were some errors in experimental
18 design and conduct which were noted in the request for
19 additional information, and some of our discussions
20 that we've had with DOE, one of these was in regards
21 to the redox potential. I'll discuss that in more
22 detail.

23 In some cases the exclusion of data, and
24 we're not certain if that was -- if that may or may
25 not -- if that should be incorporated or not, and

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1 that -- one instance of that is with the reduction and
2 retention of technetium, and that will also be
3 discussed, a reliance on preliminary research for some
4 key assumptions we had some questions about that we
5 needed to have some more information before we moved
6 forward.

7 And in some instances there was limited
8 site-specific data, and for some of those limitations
9 there was a reliance on some references, which is not
10 uncommon; however, some of those -- some of the use of
11 those references, one of the points is that it's often
12 buried in a lengthy reference chain, which isn't a
13 problem in and of itself. However, when you dig back
14 through some of these references, there are some
15 issues.

16 For one instance, sometimes a cited
17 reference does not support the assumed value in the
18 PA. The PA may point to a document and it'll say the
19 partition coefficient for selenate is this, and when
20 you look at the document, it points to selenite.

21 Some experimental conditions for generic
22 data significantly differed from Saltstone. The K_d s
23 that are relied upon in the PA had values that were
24 determined from a formulation that used a strong
25 reducing agent, such as sodium dithionite, which isn't

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1 present in saltstone, and we need to understand if the
2 values that were assumed in the PA are consistent with
3 saltstone as well.

4 Some of the references, when you dig back,
5 are based on personal communications, certain
6 pathways, biosphere pathways were excluded based on
7 personal communications, and we were looking for
8 additional model support for the exclusion of some of
9 those pathways.

10 And in regards to expert elicitation, the
11 NRC has some documentation for a transparent approach
12 to expert elicitation documenting how it was done in
13 independent review, and we had a couple of comments on
14 that.

15 As I mentioned, our review focused on the
16 base case, and some of our concerns with the base case
17 was that in some instances it was inconsistent with no
18 conditions. And we feel that the base case should
19 incorporate all relevant known conditions and
20 reasonably account for uncertainty. Some of the
21 inconsistencies with known conditions that we're
22 trying to understand if it's significant to the model,
23 one is the base case does not assume any fracture
24 under the Saltstone monolith.

25 Another instance is the annuli that exists

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1 in between the saltstone -- as the saltstone is poured
2 and cured, it shrinks and there's an annulus that
3 forms in between the saltstone and the vault walls.
4 So we need to understand what the effect is of these
5 fast pathways.

6 Some other high-level comments were in
7 regards to limited model support in key areas.
8 Depending on the amount of risk reduction that is
9 assumed for certain engineered and natural barriers,
10 you need to -- you should have a commensurate level of
11 model support for those areas.

12 If you have a barrier that leads to a risk
13 reduction of a factor of 100, there should be multiple
14 lines of evidence supporting that, whether it's
15 laboratory results, field experiments, expert
16 elicitation, multiple models. So we had some question
17 in regards to additional model support.

18 In terms of uncertainty, clearly there's a
19 large degree of uncertainty in projecting these dose
20 responses out into thousands of years. And we had
21 several concerns with uncertainty, and in our first
22 RAI, DOE addressed some of these concerns with a one-
23 off sensitivity analysis, where they would take the
24 base case model, adjust one parameter to a bounding
25 assumption and show that it wasn't -- didn't result in

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1 a significant dose effect.

2 And our concern is, when there are many
3 uncertainties and it's not clear how these
4 uncertainties may interact, these parameter changes,
5 we felt that these should be incorporated into a
6 single base case, and this is one of the comments that
7 we put into our second RAI asking for these
8 uncertainties in parameter -- potential parameter
9 changes to be incorporated into one base case.

10 Some of -- we also had some specific
11 technical concerns such as the technetium reduction
12 and retention, and these issues that I will get into
13 in more detail momentarily. The first one is the
14 release of technetium. It's very bimodal. If the
15 technetium is reduced, it's going to be immobilized.
16 If the technetium is oxidized, it's considered a
17 highly mobile constituent. And technetium is a key
18 radionuclide.

19 So the issue is that saltstone, with the
20 slag as a reducing agent, exists very close to that
21 margin of oxidizing and reducing. So we have a lot of
22 questions, and as an open issue on whether or not the
23 technetium is reduced or retained.

24 As I mentioned, there is -- the model uses
25 a Kd value, which is a partition coefficient, or the

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1 distribution coefficient, so that is just a ratio of
2 the -- of a contaminant in the solids relative to the
3 liquids. So a high Kd would indicate that a large
4 percentage of that contaminant will be retained on the
5 solids and very little will be in the liquid.

6 So we want it to be a higher Kd to make
7 sure that the technetium is retained. And the values
8 in the PA use 1,000 milliliters per gram, and this is
9 based primarily on research -- a research paper by
10 Bradbury and Sarrott, and it's based on a formulation
11 that is somewhat different than saltstone.

12 It uses a strong reducing agent, sodium
13 dithionite, which is not present in saltstone. So we
14 want to make sure that slag, which creates the
15 reducing in saltstone, is also capable of producing
16 those reducing conditions and will provide lasting
17 reducing conditions.

18 Some of the research that DOE has
19 conducted since 2005 has indicated that the Kd may be
20 less than 1,000 milliliters per grams, rather it's
21 less than 1 or less than 100, it isn't clear, or maybe
22 it is 1,000, depending on different research
23 conditions. So we asked some questions to get a
24 better understanding of what that Kd value is to
25 understand, to make sure that the technetium is

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1 reduced.

2 And as I mentioned, the technetium exists
3 very close to that margin of oxidizing the reducing
4 conditions. This is a Pourbaix diagram with the redox
5 potential on the vertical axis and the pH on the
6 horizontal axis. Everything in gray is where the
7 technetium is reduced. So the gray area is where we
8 want to be, the white area is where the technetium is
9 oxidized.

10 And the values that were reported in 2007
11 indicate -- is the red line, and -- let me see if it
12 comes up. All right. So the line that just came up
13 is from the pH of 10 to 12 and this is roughly where
14 we exist with saltstone in terms of pH. And the
15 values that were reported in 2007 for pure blast
16 furnace slag indicated that -- between a pH of 10 to
17 12, we're very close to oxidizing and reducing.

18 However, those measurements were not
19 adjusted for in terms of the standard hydrogen
20 electrode, which is the measurements were taken with a
21 silver chloride electrode and not adjusted to the
22 standard hydrogen electrode, which is what this graph
23 is in reference to. So when you correct that value by
24 the 200 millivolts, it moves up vertically to the blue
25 line.

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1 So between 10 and 12 we're further into
2 that oxidizing region. So we had some questions as to
3 better understanding of making sure we're in the gray
4 area, and that it'll continue to be in the gray area
5 throughout the compliance period hopefully.

6 Moving into the hydraulic conductivity,
7 hydraulic conductivity just relates how much water is
8 going to flow through the system, and the dose is very
9 sensitive to the hydraulic conductivity. The more
10 water that flows through the saltstone and the vaults,
11 the higher the dose.

12 So in 2005 the hydraulic conductivity
13 was -- with the initial conditions was 1E to the minus
14 11 centimeters per second. Additional research has
15 been done between 2005 and 2009, and hydraulic
16 conductivity was increased to 2E to the minus 9.

17 There was some additional research that
18 indicates that the hydraulic conductivity has a
19 potential to be higher than that when you take into
20 consideration some other factors. The value of 2E to
21 the minus 9 was on several laboratory core samples,
22 and generally when you go from a smaller sample to a
23 larger sample, such as a field scale, hydraulic
24 conductivity can be increased over those laboratory
25 samples.

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1 Also there could be a significant
2 difference between preparing these samples in the
3 laboratory versus field emplacement, so the hydraulic
4 conductivity may be higher in the field than it is in
5 the laboratory.

6 And another issue is the curing
7 temperature. The saltstone, when it cures, may be at
8 an elevated temperature over the room temperature that
9 the saltstone was cured at. And if it is at a higher
10 temperature such as 60 degrees, the research that was
11 conducted by DOE indicated that the hydraulic
12 conductivity could be as high as 80 to the minus 7.

13 And clearly these are very small numbers
14 and what's the difference between minus 11 and minus
15 9. At E to the minus 11, that is water moving on
16 centimeter in 10,000 years. At E to the minus 9, that
17 is 100 years to move one centimeter. And when we get
18 closer to E to the minus 7, we're talking about water
19 moving through saltstone as centimeters per year,
20 which can have a potential significant effect on the
21 dose.

22 So we need to understand better where
23 we're at with the actual in-place saltstone, and DOE
24 is working on producing some core sample measurements
25 so we can have a better understanding of exactly

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1 what's happening in the field and not having to rely
2 on these laboratory measurements so we can eliminate
3 some of that uncertainty.

4 Some other questions that we had were in
5 regards to the moisture characteristic curves. Under
6 saturated conditions the hydraulic conductivity
7 defines the flow through the system. However, under
8 unsaturated conditions, as you start to remove water
9 from the system, it's a combination of the
10 permeability and the relative permeability.

11 So if the -- on the horizontal axis we
12 have saturation, on the far end is 100 percent
13 saturated. So at 100 percent saturation -- I keep
14 pointing with the pointer that doesn't have a
15 pointer -- at 100 percent saturation, the relative
16 permeability would be one. However, as you decrease
17 that level of saturation, the relative permeability
18 decreases.

19 The curve at the top is for the -- for
20 concrete medium quality, and this is consistent with
21 what is shown in the literature. So at about 99
22 percent saturation, which is what the PORFLOW model
23 indicates for saltstone, it would have -- and keep in
24 mind -- oh, thank you very much, I appreciate it.

25 (Pause.)

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1 MR. ALEXANDER: Okay. So for saltstone we
2 have a hydraulic conductivity of 2E to the minus 9,
3 and it exists at a saturation of 99 percent. So if
4 you go up, you have a relative permeability of 1E to
5 the minus 2. So in effect you decrease the relative
6 permeability by two orders of magnitude.

7 So in the system, when you remove 1
8 percent of the water from the saltstone, from the
9 porous face, you have a decrease in hydraulic
10 conductivity of two orders of magnitude. So in effect
11 you go from 2E to the minus 9 to 2E to the minus 11.
12 So instead of 100 years per centimeter, you're back up
13 to 10,000 years per centimeter.

14 Some of other questions in regards to the
15 moisture characteristic curves are also used to design
16 the -- to talk about the flow through fractured
17 cementitious materials. So the walls are assigned a
18 very high hydraulic conductivity of .17 centimeters
19 per second, which is very high.

20 However, the walls exist at a saturation
21 between 99 and 95 percent, and the moisture
22 characteristic curves that are in the PORFLOW model
23 indicate that the hydraulic conductivity would be nine
24 orders of magnitude less when you decrease that
25 saturation by .7 percent.

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1 So although the PA states that the
2 hydraulic conductivity is .17, in effect it restricts
3 the flows by an additional nine orders of magnitude,
4 so it's about 1E to the minus 10 is the flow through
5 the walls. And when you look at the intermediate
6 outputs from the PORFLOW model, it indicates that the
7 walls are actually acting as a barrier to flow.

8 So we had some questions and we needed to
9 better understand what the effect is of these curves,
10 if these curves might be higher up, what would be the
11 effect on the dose. So that -- so DOE is working with
12 us on looking at those curves and what the effects
13 are.

14 When we start to put some of these issues
15 together, we end up with a conceptual model that may
16 be different than what the PA is indicating based on
17 what the model may be doing down in some of the
18 details, in some of those weeds. So on the left, this
19 is the NRC's interpretation of the base case, and on
20 the right is what we would consider like with the
21 known conditions and taking into account uncertainty.

22 In the DOE model, the Saltstone is
23 considered to be intact, whereas based on video
24 images, the Saltstone is fractured. And it's not
25 clear to us what the effect is of that fracturing. In

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1 addition, there is an annulus that's been shown to be
2 present in the Saltstone vaults, which aren't taken
3 into account in the DOE base case model.

4 In regards to the vault walls, as I
5 mentioned, the DOE model indicates that the hydraulic
6 conductivity is very high; however, the relative
7 permeability effectively decreases that hydraulic
8 conductivity. So we don't have -- we have a flow
9 barrier for the wall. And taking into account a
10 moisture characteristic curve that we might expect
11 would allow for invective release through the walls.

12 In addition, we have a material interface,
13 which for engineered materials has a tendency --
14 engineered materials have shown a tendency to leak at
15 these material interfaces, and is a potential fast
16 pathway as indicated in the DOE base case model.

17 Then as we move down from zero years to
18 8,000 years, looking at the difference, like with the
19 DOE model, on top of the vaults there's a two foot
20 thick lateral sand drainage layer, and on top of that
21 lateral sand drainage layer there's a geotextile
22 filter fabric that prevents larger particles from
23 migrating into the sand, and it's responsible for the
24 shedding of 99.8 percent of this water, even at 8,000
25 years.

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1 And we had some questions if this
2 geotextile filter fabric fails and you get the
3 migration of particles larger than colloids,
4 potentially of the overlying backfill material, and if
5 the roof fractures, all of this water -- some of that
6 water may be migrating into the system.

7 And at 8,000 years we still have a
8 Saltstone monolith that is not fractured. We had some
9 questions on the longevity of the reducing conditions.

10 And based on the flow through the walls and the flow
11 through the saltstone, we end up with a diffusive
12 release in the DOE, whereas we would expect more of an
13 invective release occurring.

14 So we also wanted to understand what the
15 effects -- we weren't able to run the model from start
16 to finish with each of these. DOE was able to provide
17 us the model files and we looked at the effective flow
18 through the system when you change some of these
19 parameters.

20 So in this graph, on the vertical axis we
21 have the factor of flow greater than the base case.
22 So if you take the base case, and this is the amount
23 of water flowing through the system, it would just be
24 one. And for number two I revised the moisture
25 characteristic curve for saltstone and the clean

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1 grout, the overlying clean grout with values that are
2 more typical in the literature. And it increases the
3 flow by a factor of 14.

4 I also took a look at if we revised the
5 lateral drainage layer. If we used the values for the
6 overlying backfill, if that backfill migrates into the
7 sand, it will have also an increase flow factor of 14.

8 If the hydraulic conductivity is not $2E$ to the minus
9 9, if it's the same hydraulic conductivity with the
10 experiments that were conducted at 60 degrees, it
11 would increase the flow by a factor of 145. And these
12 three factors together would result in a flow increase
13 of a factor of 226.

14 And I just want to point out that this
15 increased flow factor doesn't necessarily correspond
16 to an increased dose factor. There are other values
17 in there that have an effect. So some of our
18 questions are we want to understand what the dose
19 effect is when -- if these values are -- if the PA
20 values are closer to some of these values.

21 And I also wanted to point out that these
22 flow increases don't take into account fracturing of
23 the saltstone or vaults, the flow through the walls,
24 and the hydraulic conductivity that accounts for
25 degradation or scale or field emplacement.

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1 I also wanted to mention that the NRC is
2 not constrained to review solely the base case model.

3 We don't have to rely on that for compliance
4 determination. We can look at alternative cases if we
5 feel that better represents the system and we can have
6 reasonable assurance that the performance objectives
7 will be met.

8 DOE provided several alternative analyses.

9 We had some concerns, there's several limitations
10 with some of those alternative cases. However, the
11 synergistic case which was provided by DOE goes a long
12 ways towards some of our concerns.

13 The synergistic case was developed in
14 response to LFRG review, and is considered a
15 pessimistic case that looked at the synergistic
16 failure of several engineered barriers that included
17 the earlier degradation of the closure cap,
18 degradation of the vaults at year 500, and the
19 fractured saltstone enclosure.

20 Some of our concerns with the synergistic
21 case, there are potentially a lot of conservatisms in
22 the synergistic case. However, when you start to look
23 at some of the intermediate results, there may be some
24 optimism in the -- how the model is handling some of
25 these inputs. So we need to -- we asked for a better

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1 understanding of how these conservatisms and potential
2 optimisms weigh out.

3 And some of our concerns are the flow
4 through the saltstone such as the moisture -- some of
5 the moisture characteristic curves still, some of the
6 hydraulic conductivities, also the reducing capacity
7 in some of the biosphere parameters.

8 In addition to the synergistic case, DOE
9 also provided a hybrid approach, which the NRC does
10 not disagree with. It's a deterministic PORFLOW model
11 that is coupled to a probabilistic GoldSim model. And
12 some of our comments in regards to the hybrid approach
13 was that it is built on a PORFLOW model that we have
14 some questions about. So some of the data coming out
15 of the GoldSim model, we have some questions because
16 we have questions about the PORFLOW model.

17 And we also had some questions in regards
18 to the probability of the different cases, such as
19 Case A is assigned a relatively high probability and
20 Case A doesn't assume fractured saltstone. So we have
21 some questions in regards to whether or not the
22 probability for Case A is high. In addition, we had
23 some comments in regards to the bases for the
24 parameter distributions for the inventory and the Kd
25 values.

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1 So just in summary in regards to the
2 history of the Saltstone project, we reviewed the 2005
3 PA, our conclusions of reasonable assurance were based
4 on key assumptions being met, we've reviewed
5 additional research as has been made available and NRC
6 is currently reviewing the 2009 PA.

7 The request for additional information was
8 risk informed focusing on the key factors that were
9 identified in the monitoring plan, and we just want
10 to -- and in general we want to make sure that the
11 conceptual model is consistent with the mathematical
12 model in many areas in regards to the as-built
13 conditions, some of the degradation processes over
14 time, and the flow through the system. And we also
15 had comments on the bases for key data and parameters,
16 as well as model support in additional areas.

17 I believe that's it. If -- Nishka, are we
18 going to questions at this point?

19 MR. SUBER: Yes, yes. Yes, we were going
20 to open up -- this is Gregory Suber. We were going to
21 open up the floor to anyone who has any questions on
22 the NRC presentation.

23 (No response.)

24 MR. SUBER: No one in the audience?
25 Anybody on the phone have a question on the NRC

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1 presentation?

2 FEMALE VOICE: Not at this time.

3 MR. SUBER: Okay. Very well. Well, thank
4 you.

5 FEMALE VOICE: Not right now.

6 MR. SUBER: All right. Thank you, George.
7 Appreciate that.

8 Okay. So I guess then we will turn the
9 podium over to DOE.

10 And I believe, Pat, you're the first
11 speaker.

12 MS. SUGGS: Thank you.

13 I'm Patricia Suggs. I'm the Salt
14 Processing Team Lead for DOE at the Savannah River
15 site, and I'd like to talk about Saltstone operations
16 and monitoring.

17 My purpose here tonight is to provide a
18 status of our operations and monitoring activities,
19 and that includes several things, salt waste
20 processing.

21 And we are currently operating our interim
22 salt processing process -- we call it ARPMCU; it's
23 performing very well, in fact, much better than we
24 anticipate before we turned it on, so we're very
25 pleased with its performance.

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1 This includes -- followed by -- salt
2 processing is the Saltstone disposal operations, and
3 then I'll describe also DOE's process for disposal
4 operations. And at that point in the program I'll
5 turn it over to Ms. Ginger Dickert to discuss some of
6 the technical issues that we heard from the NRC on,
7 and then DOE's approach to address their requests for
8 additional information and our path forward.

9 At Savannah River, our liquid radioactive
10 waste is stored in underground waste tanks. It's in
11 three different phases, three different physical
12 forms: sludge, saltcake, crystalized saltcake, and
13 supernate. And if you see -- if you're able to see
14 the photos, the top one is the liquid salt waste we
15 commonly call supernate, the middle photo shows the
16 crystalized solid salt waste, and the bottom photo is
17 our sludge waste, and that's the minority of the waste
18 type that we have at Savannah River.

19 Am I too loud? No? Okay.

20 The sludge waste is vitrified at the
21 Defense Waste Processing Facility and those -- after
22 being processed into borosilicated glass and placed
23 into steel cans, they're stored for alternate future
24 disposal at a different location.

25 The salt waste is processed to remove the

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1 radioactivity -- that includes strontium, actinides
2 and cesium -- for vitrification with the sludge so
3 that those radionuclides do go with the sludge to
4 ultimately be co-disposed with the sludge.

5 And then lastly, the decontaminated salt
6 solution is treated at the Saltstone Processing
7 Facility and disposed of onsite as a low-level waste
8 at the Saltstone Disposal Facility.

9 At the Saltstone Disposal Facility, the
10 decontaminated salt solution is mixed with a reducing
11 grout, which you heard George allude to earlier, to
12 form a solid, stabilized waste form, and it's placed
13 in engineered barriers for disposal.

14 The Saltstone Disposal Facility is
15 permitted by South Carolina DHEC as a Type 3 landfill.

16 Historically, Saltstone has been used to dispose --
17 disposition of low-level waste streams, mainly
18 resulting from our Effluent Treatment Facility,
19 operation of that facility, and that's a very low-
20 level water treatment, final treatment process.

21 And then since February 2008, again,
22 following consultation process with the NRC, in
23 accordance with Section 3116 of the NDAA of fiscal
24 year 2005, a new law, DOE has dispositioned
25 decontaminated salt waste at Saltstone Disposal

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1 Facility.

2 Just a note that from the consultation
3 process, DOE and NRC base their conclusions on
4 analyses performed from several technical documents, a
5 1992 performance assessment, a 2005 special analysis,
6 a 2005 performance objectives demonstration document,
7 and the basis document for the DOE waste
8 determination, and then lastly, responses to NRC's
9 request for additional information at that time.

10 Since the consultation process has been
11 completed, in accordance with Section 3116(b) of the
12 NDAA, NRC's been performing monitoring activities,
13 which is different from the consultation portion of
14 the process, in coordination with South Carolina DHEC,
15 our state regulators, since 2006, well, actually since
16 we existed the consultation phase in 2005.

17 To let you see what Saltstone looks like,
18 and I know the folks on the telephone can't see this,
19 but the Saltstone Production Facility is where the
20 decontaminated salt solution is mixed with flyash,
21 slag and cement and that's roughly a 45 percent, 45
22 percent, 10 percent dry mixture. It's poured in the
23 concrete vaults to solidify.

24 And then at the disposal facility
25 themselves, they're engineered disposal facilities,

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1 they've got low water permeability, and excellent --
2 or the -- an excellent non-leaching qualities of the
3 grout waste form, and there is a non-hazardous product
4 there.

5 Looking at the photos, you see an aerial
6 photo at the upper right, the largest rectangle is
7 Vault 4. Just to the right of that is Vault 2, at the
8 bottom of the photograph is the Saltstone Production
9 Facility where the grout is mixed with the low-level
10 waste liquid.

11 And then at the bottom you'll see two of
12 our new newly designed engineered disposal facilities,
13 and you'll notice that they are round rather than
14 rectangular.

15 These are still under construction and, in
16 fact, we, you know, have welcomed NRC coming to see
17 these as we develop them. They have some -- and we
18 think, you know, it's nice to have new features that
19 we would consider improvements from approaches from 20
20 years ago. So we're very pleased with those.

21 And again, we cannot use those until we
22 have completed the process we're in right now. To
23 complete performance assessment, these need to be
24 incorporated into a performance assessment.

25 And then of course in the photo on the

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1 bottom right you see an artist's rendition of how a
2 vault may look after it's been covered with soil caps
3 and clay barriers that would be its ultimate lay-up
4 form at the time of closure.

5 DOE describes its approach for disposal
6 operations in DOE Order 435.1, and that gives us
7 certain instructions. It tells us to regularly assess
8 the performance of our radioactive disposal
9 facilities. We prepare annual reports for review by
10 the DOE Low Level Waste Federal Review Group, and that
11 acronym we usually use is LFRG.

12 It tells us to maintain the currency of
13 our performance assessments by performing maintenance
14 plan activities, this could be research and
15 development activities to generally stay as current as
16 possible with the conditions at the facility, or with
17 the evolving technical knowledge; perform research and
18 development activities to strengthen our knowledge and
19 the technical basis of the analysis; and it also
20 considers new research, or new information rather
21 coming from research and development, or changes in
22 physical -- or understanding of the physical
23 parameters around disposal areas, ground water
24 modeling data, facility operations; and then to update
25 that analysis as appropriate.

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1 The performance assessment that we are
2 currently working on, you know, includes new
3 information from ongoing research and development
4 activities. It includes lessons learned --

5 (Pause.)

6 MS. SUGGS: The performance assessment we
7 are -- I think this is okay -- we are currently
8 working on includes new information from ongoing R&D
9 activities, incorporates lessons learned from the
10 consultation process and monitoring activity under
11 3116, and it includes an analysis, importantly, for
12 the newly designed disposal cells, and it's informed
13 by our own ongoing salt processing activities that may
14 alter what we have used as assumptions, so we keep up
15 with that.

16 The analytical approach is consistent with
17 that that was used for the F Tank Farm performance
18 assessment, and it was provided to NRC, South Carolina
19 DHEC, and the public well in advance of DOE decisions.

20 It's really rather lengthy.

21 In George's presentation he said, you
22 know, they started working on it in November 2009. We
23 began this process back in 2008 and we have still some
24 more to go. So it's technically complex and the best
25 way to get a good product is to engage all the

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1 different participants as early as possible.

2 At this time I'd like to turn the podium
3 over to Ms. Ginger Dickert. She's going to address
4 some of the technical issues raised by the NRC.
5 Ginger works for Savannah River Remediation and she is
6 the manager of the Closure and Waste Disposal
7 Authority, which includes performance assessment
8 development and coordination.

9 Ginger?

10 MS. DICKERT: Good evening. It's my
11 pleasure to get to talk to you this evening. I'm
12 going to cover a few things.

13 I'm going to start out with a little bit
14 of background, how did we get where we are and how do
15 our processes work, and our interactions between the
16 Department of Energy and the Nuclear Regulatory
17 Commission, talk about the process of developing the
18 performance assessment, the work that was done to
19 develop these inputs and assumptions that we're
20 discussing tonight, and then discuss some of those
21 technical inputs and assumptions and parameters that
22 have been already mentioned.

23 To give you an idea of the scope of the
24 performance assessment, the performance assessment
25 covers the current and the future disposal activities

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1 that will occur throughout the life of this program.
2 The circles that you see here will be our future
3 disposal cells. They are, as Pat Suggs mentioned to
4 you, a new design, a round design. The current
5 facilities, Vault 4, Vault 1, which is no longer in
6 use for Vault 1, you can see those are already
7 constructed.

8 I've also included for your future use, if
9 you should take a copy of the handout, a list of
10 acronyms because we are a very acronym-prone group,
11 and I will probably slip into the vernacular before
12 the evening is over, so I've put you a list in there
13 that you can have for the future.

14 At the bottom I've also put a little bit
15 of information about some of the key radionuclides
16 that were mentioned in George Alexander's presentation
17 so you can see the half lives of those materials, and
18 then how we get to the radium 226, which is one of our
19 risk significant radionuclides. The radium 226 does
20 not exist today, but in-grows through the decay first
21 of the uranium 234 to thorium 230 and then further to
22 radium 226.

23 Okay. Back up to what is a performance
24 assessment. A performance assessment is really a risk
25 assessment tool. It has been used extensively in the

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1 work that's being performed at the Savannah River
2 site, not only for the discussions that we're having
3 with the Nuclear Regulatory Commission, but also in
4 the discussions that we're having with South Carolina
5 Department of Health and Environmental Control, and
6 with the Environmental Protection Agency, and serves
7 as the backbone for all of those decisions.

8 This is the process of evaluating the fate
9 and transport of both the radionuclides as well as any
10 hazardous chemical constituents for the long term
11 throughout the environment as a result of the actions,
12 disposal actions that we're currently undertaking.

13 It provides the best estimation of what
14 the consequences over the course of time, both from
15 chemical and radionuclides -- radiological will be
16 over extended periods of time. It addresses
17 uncertainties, it recognizes that there are
18 uncertainties and what's going to happen over the next
19 10,000 and 20,000 years. And it reflects the
20 uncertainties associated with that analysis.

21 The modeling is performed also to
22 determine which things the system is most sensitive
23 to. In other words, which parameters are most
24 important to have the lowest uncertainty on. Those
25 parameters which really don't affect the fate and

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1 transport are not the ones that we want to concern our
2 attention to.

3 Pat Suggs mentioned that the DOE and DOE
4 Order 435.1 which governs the management of
5 radioactive waste. In that it defines the process to
6 be used for the development of performance
7 assessments. Initially, a performance assessment --
8 I'm going to work my way from left to right on the top
9 line -- a performance assessment will be developed.

10 It's then reviewed through DOE Savannah
11 River. This group is a group of local, federal
12 technical personnel, as well as expert subcontractor
13 expertise that is brought in to specifically review
14 that document. Revisions from that process are
15 incorporated.

16 The document then goes through a much --
17 another robust review within the DOE process. This is
18 the Low Level Waste Federal Review Group, or LFRG.
19 There's the LFRG acronym that you'll see us use.
20 Again, this is additional federal technical personnel
21 along with other subcontractor experts.

22 Upon the completion of that review, it
23 goes to the DOE headquarters and the Office of EM-40
24 for final approval, and results in the issuance of a
25 saltstone disposal authorization statement. This is,

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1 if you will, is analogous to a state permit, it is the
2 DOE authorization for the regulation of the
3 radionuclides that would be disposed of in this
4 facility.

5 The DOE 435.1 also requires a monitoring
6 plan, and a long-term closure plan, and requires an
7 ongoing PA maintenance process. The ongoing PA
8 maintenance process involves an annual review of the
9 current performance assessment to assure that it still
10 reflects the latest knowledge and the latest
11 performance actually observed of the system.

12 That is documented in an annual report
13 which is provided to and approved by the LFRG at DOE
14 headquarters, and also the update of a performance
15 assessment maintenance plan.

16 Now, a maintenance plan, it's not your
17 typical definition of maintenance. This is really
18 what parameters do we need to continue to addition
19 research and development on to reduce the
20 uncertainties, where do we need to be reflecting
21 changes that we're seeing in perhaps operating
22 conditions, or those things in the performance
23 assessment.

24 The research and development is conducted,
25 and then we have the opportunity to perform a special

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1 analysis, and you heard that for Saltstone one of
2 those was performed in 2005 that can update the
3 performance assessment, or it can result in a PA
4 revision if there are significant changes that are
5 needed.

6 We have a process for reviewing any of
7 those changes to determine if that revision is needed
8 called an Unreviewed Disposal Question Evaluation, and
9 that's really taking new information and comparing it
10 against the current assessment to see if a change is
11 needed. It's as a result of this maintenance process
12 that the current revision, the 2009 Saltstone Disposal
13 Facility PA revision was generated.

14 Now let's lay in on top of that the NRC
15 involvement. The National Defense Authorization Act,
16 Section 3116, added an additional agency into the
17 process for additional oversight and review, and that
18 is how this process works.

19 The draft basis document for the waste
20 determination was developed that included the
21 performance assessment information. The NRC conducted
22 their review under the consultative phase of 3116, and
23 issued their technical evaluation report. This is the
24 one that contained the eight factors that George
25 Alexander discussed earlier.

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1 We have, at the site, the Section --
2 actual waste determination and the basis document were
3 issued, and then the NRC issues a -- develops and
4 issues a monitoring plan of the things they're going
5 to be doing both in site field observations and in
6 ongoing review of technical research and development
7 that occurs throughout the life of the program.

8 Again, in the monitoring phase of the NRC
9 and DOE interactions there is a continuous loop cycle
10 as well where we generate additional research and
11 development information and review that with the
12 Nuclear Regulatory Commission. They issue observation
13 reports, follow-up reports, and we consider that and
14 use that information in our evaluations as well.

15 What types of interactions do we have
16 between the two agencies in monitoring? I already
17 mentioned on-site observations where the NRC staff
18 actually comes out, visits the facility, sees the
19 operating conditions.

20 Today we had an observation visit, had
21 some folks who actually were out touring around the
22 vault observing vault conditions and getting a review
23 of some of our last quarter of -- the last quarter of
24 operation.

25 They also do technical reviews. We hold

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1 routine interactions where we review new technical
2 reports as they are issued to understand their
3 implications. They involve preparation on both
4 parties' part, conduct to the interaction and then
5 follow up. And all of these are documented and the
6 results of those are publically available.

7 Our ongoing R&D activities are used to
8 reduce our uncertainties and to demonstrate the
9 validity of the assumptions that we've used. The DOE
10 has prioritized activities. Now, these ongoing R&D
11 activities had begun even before the existence of the
12 3116 legislation.

13 However, with the development of that
14 legislation, and the input that we have from the TER
15 and the eight factors, the Department of Energy used
16 that to inform the prioritization process for what
17 research and development is most important to be done
18 early, the first things that need to be done and where
19 that R&D needs to be focused.

20 It's a very specialized set of research.
21 And again, it's focused at the things that are risk
22 significant. It's a risk informed approach, and it's
23 focused on risk significant items.

24 Those PA results are either incorporated
25 directly into the performance assessment, as in this

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1 case the new performance assessment was developed, or
2 are reviewed through the unreviewed disposal question
3 evaluation process to assure that the PA was still
4 binding and valid based upon that new information.

5 This is a chart that we actually use
6 between the Department of Energy and the Nuclear
7 Regulatory Commission. It has been existence -- in
8 existence since the first documentation review that
9 was performed in 2006. The information was -- this
10 chart is developed and tailored to the eight factors
11 to show how each of the pieces of R&D we're doing
12 align with the eight factors in that TER.

13 The activities at the top -- the colors
14 don't come out very well -- on my laptop and on the
15 handouts you can see that these activities are green,
16 but that doesn't look very green on that projection.
17 The activities that are in white are those that have
18 not yet begun, the activities in yellow are those that
19 are still in progress, and the activities in green
20 would be those that have been completed.

21 At the start of -- when we began using
22 this chart the activities at the top were not green.
23 They were either yellow, already in progress for
24 research and development that was ongoing, or white
25 for work that had not yet begun. As we continue the

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1 research and development and the completion of each
2 step, we hold our technical reviews with the Nuclear
3 Regulatory Commission and then update this chart to
4 show the progress.

5 The document numbers on the left represent
6 the actual technical documents that document that
7 research and development, and all of those documents
8 are publically available as well.

9 One other point I'll make on this one --
10 I'm going to have to get water here in a minute -- the
11 research that was here was prioritized as the most
12 important, and all of these were completed in a manner
13 in a which they could be incorporated -- on timing
14 where they could be incorporated into the 2009 PA.
15 These additional activities, research and development
16 activities, are still ongoing and are not yet
17 reflected in the 2009 PA.

18 DOE has made a significant past and
19 ongoing investment in the R&D activities associated
20 with the Saltstone Disposal Facility. As you can see,
21 millions of dollars are being spent every year to
22 reduce the uncertainties associated with these
23 assumptions and inputs to the performance assessment.

24 Each year, as part of the 435.1
25 maintenance process for performance assessment, the

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1 projected and planned maintenance for both the next
2 year as well as out -- looking out for several more
3 years, is updated. So though you see a decline here,
4 that's simply reflecting what we know today will occur
5 there. As we do this testing, these are frequently
6 revised on an annual basis, along with funding
7 allocation necessary to support that R&D.

8 Now I'd like to look at a few of those
9 actual test results. This, again, I'm showing you
10 actual charts that we use between the Department of
11 Energy and the NRC, and this one deals with -- at the
12 top, deals with hydraulic conductivity.

13 The initial testing that was conducted
14 here -- we recognized that we had one data point in
15 this test -- during the course of the conduct of this
16 test, a power failure occurred in the laboratory, and
17 so one data point on that test was skewed as a result
18 of that power failure. That experiment was damaged.

19 We reported in that report -- for the sake
20 of completeness, we included that value, but noted
21 that it was an invalid value. The remainder for the
22 values that were observed were very closely coupled, a
23 very tight data range, and therefore those were used
24 as the basis of the assumptions, because this is the
25 piece that was finished when we started the Saltstone

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1 PA.

2 Since that time we've done some additional
3 testing and additional reports. Out of this work we
4 were exploring not only testing which would
5 demonstrate the expected conditions in the Saltstone
6 facility, but also did a number of different mixtures
7 and different experimental cases that would look at
8 ranges of parameters.

9 What we are trying to do with that was to
10 understand what factors were most important in the
11 operation of the facility to the resulting hydraulic
12 conductivity of the grout form, of the solidified
13 waste form.

14 George talked about the work that was done
15 at a cure temperature of 60 degrees. Although we
16 don't typically have those kind of temperatures in our
17 facility, we did do a test where we elevated the
18 temperature to 60 degrees. We wanted to see
19 whether -- how important that parameter was so we knew
20 how tight our controls in the operating of the
21 facility needed to be.

22 And we found that the solidified waste
23 form is indeed sensitive to temperature. That has led
24 to additional testing to help us define some of those
25 operating parameters so we know how tightly we need to

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1 control that in the facilities.

2 The lower section of this chart is related
3 to the Kd values, again, a very important parameter
4 for our use. The first -- this is an area
5 particularly for technetium where we've had some
6 experimental difficulty. In our initial testing we
7 had some difficulties in maintaining a non-oxygen
8 environment so that we could conduct the test.

9 The first testing we had -- the
10 experimental test was contaminated, if you will, with
11 oxygen, and therefore the test was terminated. We
12 recognized that and changed the experimental setup.

13 Additional equipment to be able to perform
14 the test in an inert environment was purchased for the
15 Savannah River Laboratory, the experimental design was
16 performed so that we could get a better test, and all
17 of that testing is culminating in this final testing
18 here, which we expect to have available at the end of
19 March.

20 These sets of data, the experimental
21 difficulties of those have been addressed with this,
22 and the preliminary results that we have from the
23 current testing show very strong support for the
24 hydraulic conductivities used in the performance
25 assessment.

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1 Again, this is another chart that we use.
2 This one was looking at samples out of the actual
3 Vault 4. We recognize that it's -- any time that you
4 make a simulant, it can vary from the actual as-
5 emplaced material. These were attempts to actually
6 get some of the solidified waste form from the Vault 4
7 and test those actual parameters and not just have to
8 test simulants.

9 What we found was that our solidified
10 saltstone is a very hard, a very solid waste form. As
11 we tried to take this sample, we had to do a dry core
12 drill. If we had used the water, the water itself
13 would have contaminated the sample and invalidated the
14 testing that needed to be performed.

15 If you're familiar at all with any
16 concrete core drilling, you know that you use water
17 because you generate a lot of heat with that bit as
18 you try to cut through that concrete. And, in fact,
19 we did. We saw some -- as a result of that high heat
20 generated by the bit, we saw some cracking around the
21 bit itself, we saw some crumbling of the edges as we
22 were trying to cut through that.

23 Once we successfully got a core sample and
24 had to break it free and pull it out, we found that we
25 couldn't readily remove the sample from the bit, and

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1 actually had to break the sample into pieces to get it
2 out of the bit.

3 In the course of doing that, a good
4 observation, when the saltstone solidified product is
5 in a reducing state, it has a distinct color unlike
6 that of natural concrete and distinctly different from
7 that of oxidized -- of an oxidized material, and so we
8 did see that very distinct reducing environment.

9 However, because of the amount of work
10 that we had to do to get it out of -- the core sample,
11 that, in fact, invalidated it for some of the tests
12 that we wanted to do. Those were -- these results,
13 again, the ones that are in green, have all been
14 reviewed with the NRC.

15 We've gone to evaluate new methods. Our
16 engineering folks have developed an entirely different
17 technique where we're going to try to get some
18 additional samples where we don't compromise the
19 ability to do the tests that we want to do as a course
20 of actually obtaining the sample. We have reviewed
21 those alternate methods with the Nuclear Regulatory
22 Commission in July of 2010, and are continuing to have
23 discussions relative to that potential sample
24 methodology.

25 I will tell you that there is a

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1 significant amount of research and development going
2 on to -- very focused on the things that are risk
3 significant, very focused on the items that are
4 identified in the eight factors of the TER.

5 The development of the performance
6 assessment in the waste determination is not just a
7 single document, but it's really quite a journey. And
8 this documents a part of that journey. There's a
9 poster in the back of the room that contains the
10 entire time line.

11 (Pause.)

12 MS. DICKERT: Starting here, the Saltstone
13 waste determination basis document was published in
14 April for 2005. This then entered into an extensive
15 review and consultation process with the Nuclear
16 Regulatory Commission, with the -- culminating in the
17 issuance of the final waste determination basis
18 document in January of 2006. It was at that point
19 that the monitoring activities were initiated.

20 As well as that, during this process it
21 was identified that there were a number of technical
22 issues between which the two agencies had different
23 protocols and policies. So a number of meetings
24 occurred. These were public meetings to address
25 general technical issues and to address methodologies

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1 and protocols for moving forward, to inform the next
2 set of actions of that type that were taken.

3 We initiated another performance
4 assessment for the F Tank Farm Facility in February of
5 2007. In conjunction with that, we started a new
6 process of holding scoping meetings between all of the
7 effective agencies to gain agreement on the inputs and
8 assumptions that would be used in advance of
9 performing the actual analysis.

10 A series of meetings was held across a
11 period of 11 months to define all of those inputs and
12 assumptions, including modeling parameters, the types
13 of model -- conceptual modeling that would be done,
14 and that resulted in a performance assessment for F
15 Tank Farm issued for review in August of 2008.

16 Those scoping meetings not only occurred
17 between the Department of Energy and the Nuclear
18 Regulatory Commission, but also involved South
19 Carolina Department of Health and Environmental
20 Control and the Environmental Protection Agency to
21 ensure -- as I said at the beginning, our performance
22 assessment is used to inform all of these decisions,
23 so we wanted to ensure that all of the agencies had
24 the opportunity to participate in the development of a
25 consensus set of inputs and assumptions.

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1 And there was a lot of comments received
2 on the performance assessments and held during these
3 scoping meetings from the public, the EPA, and South
4 Carolina DHEC, as well as the Nuclear Regulatory
5 Commission.

6 The hydrogeology, the assumptions relative
7 to consumption by individuals are the same for the
8 Saltstone Disposal Facility as the F Tank Farm
9 Facility and therefore the results of the F Tank Farm
10 scoping meetings were applied in the development of
11 the Saltstone Disposal Facility performance
12 assessment.

13 I've provided some information here for
14 the folks in the public to where you can find the
15 meeting minutes for those meetings, the website for
16 the DOE posting, and the session numbers in the ADAMS
17 system if you wanted to find those on the NRC system.

18 That was not the end of the journey. The
19 F Tank Farm performance assessment, we received
20 comments back on it in January of 2009, continued to
21 use that information in with our Saltstone Disposal
22 Facility performance assessment development, resulting
23 in the performance assessment being issued to the LFRG
24 for review in June of 2009.

25 To give you an idea of what is an LFRG

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1 review team, this is a group of people, and this is
2 actually two slides and I'll cover both, but it's a
3 group of very senior, very technical personnel not
4 only from within the Department of Energy, but
5 recognized experts from universities and other
6 specialized groups, to assure that we're getting a
7 very broad cross-cutting in depth review of the
8 performance assessment.

9 As was noted previously, the Nuclear
10 Regulatory Commission did observe the LFRG review of
11 the Saltstone Disposal Facility PA as part of their
12 monitoring activities and documented in NUREG-1911
13 revision 2 that they found the process to be thorough
14 and comprehensive.

15 This was the conclusion of that LFRG
16 review. The comments were incorporated and then the
17 Saltstone Disposal Facility performance assessment was
18 issued to the Nuclear Regulatory Commission for their
19 continued review in their monitoring role.

20 Those activities continued with the
21 issuance of a set of RAIs, responses, and the second
22 set of RAIs being issued in December of 2010. At the
23 same time our other performance assessment development
24 activities have continued. So there's been much
25 opportunity to take the information that we're gaining

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1 from each of these performance assessments to inform
2 the development of each subsequent one, and we've been
3 using that information in that way.

4 The PA development is a very rigorous and
5 thorough process, it undergoes multiple, very rigorous
6 and thorough reviews to ensure that we get the
7 absolute best product that we can get to be
8 representative of future conditions.

9 Looking at some of the things that are
10 considered, and transport of the environment is very
11 important to understand, the geological and
12 hydrogeological conditions under the facility. We're
13 very fortunate that this area has been extensively
14 studies for over 60 years, and we have a tremendous
15 wealth of knowledge of not only the substructure here
16 where you see -- in fact, under ours we have three
17 separate aquifers, but only where those aquifers are,
18 but we have very well characterized flow and flow
19 rates through those aquifers and that's very
20 beneficial.

21 This has been one of the most
22 characterized areas -- the Savannah River site has
23 been one of the most characterized areas in the
24 nation. And so we benefit from that strong
25 characterization.

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1 What are the scenarios that we model?
2 It's a very conservative approach. First, this
3 individual -- we assume that the individual's home is
4 now built here at the Saltstone Facility. This
5 individual must be independently wealthy because he
6 doesn't work, he stays here all the time. He
7 doesn't -- he recreates at home, he stays at home, he
8 doesn't travel. He's a man of the earth here.

9 As far as scenarios go, we're looking at
10 direct ingestion of well water. We assume he drills
11 his well right down below and he drinks all of his
12 water from there. He ingests the meat and the milk
13 from the livestock that also drink that water and eat
14 that vegetation that is watered, the vegetables grown
15 in the garden are irrigated with the well water, the
16 milk and the meat from the livestock, again, eat the
17 fodder, they eat the vegetation that was irrigated
18 with that well water.

19 Direct irradiation from any recreational
20 activities that would include swimming, boating,
21 fishing in any of the -- where the water is available.

22 We consider the shower exposure, just every way that
23 you can come in contact with that water is considered
24 in these performance assessment scenarios. Very, very
25 conservative approach.

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1 This is a diagram of the conceptual model
2 that was used in the performance assessment for the
3 Saltstone Facility. The parameters are inputs and
4 assumptions that are used for each of these
5 parameters -- these are all individual parameters that
6 are modeled in models -- were derived from the scoping
7 meetings that were performed.

8 There are two types of models,
9 deterministic modeling, or PORFLOW. This is a model
10 where it looks at discreet values. You take your best
11 estimated values, put them in, it does a very, very
12 complex analysis and comes out with a single number at
13 the end of a projection.

14 The other type of modeling is
15 probabilistic modeling. This looks at ranges of
16 values and explores what happens as you vary the
17 ranges of different parameters in different directions
18 at those times. Through the course of our modeling we
19 ran over 30,000 different realizations trying to vary
20 all of the parameters and understand the implications
21 of different ones working against each other or with
22 each other.

23 In addition to running 30,000
24 realizations, those were not all run using the same
25 case. George Alexander talked about base cases and

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1 alternative cases. A base case, DOE's base case is
2 what values are expected, or in other words, what are
3 the most probable values for each of those inputs and
4 parameters.

5 The probabilistic analyses look at the
6 range of possibility, how wide could they possibly be,
7 and vary those across that range of possibility. In
8 addition, the probabilistic analyses look at some very
9 non-mechanistic assumptions, things that we can't
10 physically figure out how it could happen, but we want
11 to vary them that much to understand what the system
12 is sensitive to. You want to find those parameters
13 that are important so those are the ones you focus on
14 controlling.

15 The probabilistic analysis is used to
16 inform the deterministic analysis with the result of
17 the deterministic analysis being that value that we
18 use to compare for our compliance with the performance
19 objectives.

20 I talked about being very fortunate by the
21 very detailed characterization of the geological
22 properties. We're also very fortunate in that we have
23 the presence of a national Lab on site. This lab has
24 over 50 years of experience in support of our direct
25 activities, extremely knowledgeable and nationally

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1 recognized experts in the fields of cementitious
2 materials.

3 And, in fact, some of the national --
4 Savannah River National Lab personnel chair other
5 groups such as the Cementitious Barriers Partnership,
6 so they are nationally recognized, and have been also
7 called upon internationally to work on issues
8 regarding cementitious materials. Also experts in
9 geochemistry, hydrogeology and the actual modeling
10 codes for environmental transport.

11 Between the 1992 PA and the 2005 special
12 analysis we have implemented a number of improvements
13 in the 2009 performance assessment. In particular,
14 saltstone hydraulic properties. George Alexander
15 talked about the use of the E to the minus 11 values.

16 We have in the 2005 performance assessment
17 used values that are two orders of magnitude, more
18 pessimistic than the 2005 evaluations because our
19 research and development showed us that we -- those
20 were more appropriate as our pessimistic -- or more
21 appropriate as our assumptions.

22 We've performed extensive testing to
23 understand site-specific conditions in the original
24 performance assessment. We had to rely very heavily
25 on literature data and extensive testing has been

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1 performed. It's not as much testing as we want to
2 have, but it is testing to give us site-specific data
3 rather than relying solely on literature values.

4 And this testing has been done both to
5 characterize the Vaults 1 and 4, and in this case both
6 the 1 and 4 walls as well as for the future disposal
7 facilities, and again, for all of our expected final
8 solidified saltstone. We've done other saltstone
9 property testing looking at formula specific -- this
10 would be grout formula specific in terms of what is
11 the best formulation of the grout for the most durable
12 long-term product.

13 The fracturing of the vault walls show you
14 a little bit more information on how we modeled those.

15 We did assume that the Vaults 1 and 4 were
16 significantly fractured, in other words not a barrier
17 to flow, and we assumed that the vault walls had a
18 very high inventory present in the initial conditions.

19 It reflects the known conditions of the
20 weeping walls of Vault 1 and 4. The concrete vault
21 walls were modeled as severely degraded. In fact,
22 they were modeled as rubble, with large pore spaces
23 and significant flow. The flow that was modeled for
24 the vault walls is four orders of magnitude greater
25 flow than even the surrounding soil structure, which

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1 means that it's 10,000 times greater water flow than
2 even the surrounding soil. So they were modeled with
3 a high flow.

4 In addition, all of the pore spaces, you
5 can see in this diagram the pink color of the walls,
6 we assumed that any available pore space was filled
7 with salt solution, not just drain water or bleed
8 water, but actual salt solution for the analysis of
9 those particular vaults. That was not the assumptions
10 for the future disposal cells since we do not expect
11 them to have the kind of cracking that we see
12 currently in Vault 4.

13 As far as technetium reduction and
14 retention, we all recognize the importance and the
15 critical nature of understanding the saltstone
16 properties and minimizing the reduction -- or
17 minimizing the releases of technetium 99. We have
18 conducted formula specific testing to test that
19 reducing capability.

20 As I said before, we have had some issues
21 with some of the tests and trying to get something
22 that actually preserves those reducing properties. We
23 do have testing that has now been ongoing for quite a
24 long time, and the test results will be available at
25 the end of March, and we look forward to having a

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1 meeting as early as April with the NRC to discuss the
2 results of that.

3 The Vault inventory was another area where
4 we made significant improvements with the 2009
5 performance assessment. We had improved waste
6 characterization data. At the time of the 2005
7 special analysis salt processing had not yet begun,
8 and therefore the amount of dissolved material that
9 could have been sampled and characterized was
10 extremely limited. We have a lot more data now and
11 improved that characterization in this performance
12 assessment.

13 The inventory values are, conservatively,
14 or assumed to be pessimistic for the radionuclides of
15 concern. For example, we used a decontamination
16 effectiveness factor the Actinide Removal Facility and
17 modular control -- or for the Modular Caustic Site and
18 Salt Extraction Unit, we used a value of 12 versus
19 actual performance of about 200. So we were assuming
20 pessimistic values for what would be going into the
21 vaults.

22 We used bounding ratios to develop the
23 initial inventories of the uranium 234 and thorium
24 230, and our actual inventory disposed to date, plus
25 the projections that we're going to have through the

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1 time of filling of Vault 4, are validating that the
2 assumptions for the radionuclides of concern were, in
3 fact, quite pessimistic.

4 When I say they were pessimistic, to put
5 that in perspective for you, the actual disposal of
6 technetium 99 to date in Vault 4 is only at about 3
7 percent of the Class A Concentration Limit. The Class
8 A Concentration Limit being the lowest radioactivity
9 level classification in CFR 61. The 3116 legislation
10 was written to address disposal of Class C and greater
11 than Class C concentrations of material.

12 With over 75 -- with over 70 percent of
13 Vault 4 filled, the thorium inventory is only at .28
14 curies versus an assumed inventory of 7.5 curies for
15 Vault 4 in the 2009 performance assessment. The
16 inventories for the Saltstone Disposal Facility are
17 updated quarterly, they're posted on a public website
18 that is shown in the slides here that can be accessed
19 by the public. Our disposal actions have been very
20 conservative when compared to the analysis prepared
21 for the 2009 PA.

22 One last item to put the risk in
23 perspective. We all seek to keep the exposure as low
24 a reasonably achievable, and to minimize the curies
25 that are disposed of at the facility. But to put it

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1 in perspective for you, the annual limit for radiation
2 workers, as established by the federal government, is
3 5,000 millirems. That is a level at which there are
4 no known health effects for the exposure of personnel
5 that could receive that every year.

6 The average US citizen, from background
7 radiation, receives 310 millirem every year, and when
8 you add to that the average medical dose that we
9 received, whether it's x-rays or diagnostic -- other
10 diagnostic treatments, this is does not include actual
11 treatments like for cancer, radiation treatment, but
12 diagnostics and preventative medicine, the average US
13 citizen now receives 629 millirem.

14 If you work in Columbia, South Carolina in
15 a granite building, or in Washington, DC in a granite
16 building, you'll receive significantly more than that.

17 And if you move from South Carolina to Denver,
18 Colorado, you'll receive significantly more there,
19 again, by -- from the cosmic radiation associated with
20 the altitude.

21 Of the dose limit to a member of public
22 for the operations at Savannah River site today is 100
23 millirem. An individual could receive 100 millirem
24 without any notification. The performance objective,
25 both for the Department of Energy and as documented in

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1 10 CFR 61 is 25 millirem. The dose from just flying
2 across country round trip is 5 millirem, if you fly to
3 Europe and back you'll get 10 millirem.

4 And what we're forecasting as a result of
5 the disposal actions at the Saltstone Disposal
6 Facility over the period of 10,000 years is less than
7 2 millirem. So I think it's important for everyone to
8 realize how seriously the Department of Energy and the
9 Nuclear Regulatory Commission take the charge to be
10 very protective of the environment and of the public.

11 We have -- as I noted, we received the
12 second set of RAIs in December. We appreciate the
13 inquisitiveness, the thoroughness of the NRC review.
14 We have not yet had the opportunity to sit down and
15 discuss their concerns and our responses. We look
16 forward to that.

17 We're very confident that we can resolve
18 their questions and move forward with the approval of
19 the performance assessment and be able to put our new
20 disposal units online, and we very much look forward
21 to that process. We respect and enjoy the technical
22 interchanges that we have with the Nuclear Regulatory
23 Commission.

24 At this point I'm going to turn it back
25 over to Pat to summarize.

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1 MS. SUGGS: Thank you, Ginger. An
2 excellent job as always of making complex concepts
3 easier to understand.

4 Our approach to addressing NRC's request
5 for information on the Saltstone performance
6 assessment, this past July we responded to NRC's first
7 round of requests for additional information, and they
8 had provided those to us in April. And currently DOE
9 and our contractor, SRR, are working contract actions
10 to incorporate the work needed to address the NRC's
11 second round of requests for additional information,
12 which we received mid-December, this past December 15.

13 Following that we'll continue to work with
14 the NRC and with our state regulators in public
15 meetings if -- wherever possible, to cover certain
16 things that we have discussed a bit earlier, to cover
17 the latest research on technetium reduction. We
18 expect that research to complete at the end of the
19 March.

20 And to show that it is, in fact,
21 supportive of our 2009 PA assumptions, we would like
22 to categorize with the NRC to our mutual satisfaction
23 the relative priority of the RAIs to be resolved to
24 those that need to be addressed in the near term
25 versus those that can be addressed in monitoring plan

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1 actions and as part of the PA maintenance process.

2
3 And also, because the modeling runs are
4 very time intensive, take weeks of computer time, we
5 would want to work with the NRC to come to an
6 agreement on what those parameters ought to be in any
7 additional modeling runs, in the same concept that a
8 carpenter will tell you measure twice, cut once. We'd
9 like to come to agreement on what the parameters ought
10 to be before we make the runs and then not have to
11 repeat any more than once, just to make one run.

12 So we want use that approach, working with
13 the NRC and our state regulators to maximize our
14 efficiency and to minimize the schedule impacts to
15 finish resolving the NRC's requests for additional
16 information on the performance assessment.

17 In summary, DOE feels that we have a
18 robust process for developing, reviewing and approving
19 performance assessments. DOE uses a risk-informed
20 process to select key model parameters, and is
21 committed to continuous improvement through research
22 and development. We use probabilistic analyses to
23 understand the model parameter sensitivities and
24 uncertainties and importance.

25 And we do appreciate the thoughtfulness in

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1 reviews by the NRC of our performance assessments, and
2 their -- look forward to continuing to work with them.

3 We feel confident that our upcoming discussions will
4 help provide satisfactory responses to the NRC
5 questions.

6 And we're working to complete decision
7 pertaining to the new Saltstone performance assessment
8 underway to allow disposal operations at the new
9 disposal cells in the middle of 2012.

10 Do you --

11 MR. SUBER: Okay.

12 MS. SUGGS: Do you want to handle -- ask
13 for questions, Nishka? Okay.

14 MR. SUBER: Well, yes. Thanks, Patricia.
15 Appreciate that.

16 (Pause.)

17 MR. SUBER: We'd like to thank DOE and NRC
18 for their presentations. And does anyone have a
19 specific question for Pat or Ginger at this time?

20 (No response.)

21 MR. SUBER: Does anyone on the phone have
22 a question for DOE?

23 FEMALE VOICE: I do not.

24 FEMALE VOICE: Neither do I.

25 MR. SUBER: Okay. Great. Well, we're

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1 going to open up the floor for questions for the NRC
2 or DOE, or for any comments that any members of the
3 public would like to make at this time. We just ask
4 that when you come to the mike you state your name
5 first, and then make your public statement or public
6 comment.

7 Is anyone interested in making a public
8 statement or public comment?

9 (No response.)

10 MR. SUBER: Going once. Going twice.
11 This is your opportunity. We've got an open mike here
12 tonight.

13 MALE VOICE: Karaoke?

14 FEMALE VOICE: But no karaoke.

15 (General laughter.)

16 MR. SUBER: Yes, no singing. I won't try
17 either.

18 Seeing that no one is eager to make any
19 statements, I would like to open the floor to any DOE
20 manager who would like to make any closing remarks.

21 Would you like to?

22 MR. GUTMANN: Thank you, Greg.

23 I'm Tom Gutmann, Director of the Waste
24 Disposition Programs Division with the Department of
25 Energy.

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1 And I'd like to express my thanks to the
2 NRC for the hard work that they're doing to help
3 ensure that the work that the Department is doing at
4 the Savannah River site will indeed be protective of
5 the public and the environment. We're confident that
6 we have ensured that, as has been presented tonight
7 ably by Pat Suggs and Ginger Dickert.

8 We appreciate the efforts of our liquid
9 waste contractors, Savannah River Remediation, who is
10 performing this work in cooperation with others in
11 support from Savannah River National Lab and others.

12 And we look forward to completing, in the
13 spirit of what Pat proposed, working with mutual
14 respect for our mutual responsibilities and trying to
15 achieve the most efficient path to meeting the
16 Department's interests in remediating waste at the
17 Savannah River site as quickly as we can, to reduce
18 the hazard to the public and the environment, and also
19 to meet the NRC's responsibilities in their monitoring
20 role overseeing our activities. So thank you very
21 much.

22 MR. SUBER: All right. Thank you.

23 Once again, we'd like to reiterate that
24 there are handouts on the back table. There's also an
25 NRC feedback form. We'd like to know how we did

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1 tonight, is there something that we could have done
2 better, or if there is something that you'd like to
3 see in the next meeting.

4 Someone mentioned earlier that they
5 appreciate the fact that the meeting was here in
6 Aiken, so information like that is helpful to us as
7 we're trying to decide how to design our next round of
8 public meetings. So feel free to sign up --

9 Yes, Linda?

10 FEMALE VOICE: You want to mention that
11 all the presentations will be on ADAMS?

12 MR. SUBER: Right. And all the
13 presentations -- that's a very good point -- all the
14 presentations, including the transcript of this
15 meeting, will be available publically through the
16 NRC's ADAMS information system, and there's a pamphlet
17 in the back which gives directions on how to actually
18 go into ADAMS and sign up to get in the account.

19 Did I forget anything else, Nishka?

20 MR. DEVASER: No.

21 MR. SUBER: Okay. Well, I'd like to thank
22 my staff here and I'd like to thank our counterparts
23 at DOE and SRR for this presentation. And I wish you
24 all a good evening.

25 (Whereupon, at 7:40 p.m., the meeting was

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1

concluded.)

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