



**Savannah River  
Remediation**

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# NDA Section 3116 Accomplishments, Challenges and Lessons Learned



## *EFCOG Perspective*

**Ginger Dickert**

Senior Technical Advisor

July 18, 2013

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- Waste Determination Process included as embedded theme at WM13 conference
  - First-of-a-kind
- Recognized importance of process in EM Cleanup Program
- Included WIR experience across Complex using both DOE Manual 435.1-1 and NDAA Section 3116 processes
  - Savannah River, West Valley, Idaho National Laboratory, Hanford, DOE-EM headquarters
- Encouraged collaborative integration of all perspectives
  - Policy-makers, regulators, practitioners, stakeholders

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- EFCOG: Sonny Goldston
- DOE-EM: Mark Gilbertson, Bill Levitan, Linda Suttora
- DOE-SR: Dave Moody, Terry Spears, Sherri Ross
- NRC: Larry Camper, Chris McKenney
- DHEC: Shelly Wilson
- EPA: Rob Pope
- SRR: John Tseng, Steve Thomas

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- Covered entire cradle-to-grave nature of the process
- Opened with panel discussion by policy-makers
- Followed by panel discussion on associated accomplishments and their significance
- Included technical, regulatory and stakeholder involvement sessions throughout each day of the conference
- Culminated in all-day lessons learned workshop

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- Developed and issued summary document, ***Lessons Learned in Management of U.S. Department of Energy Waste Incidental to Reprocessing***
- Documents accomplishments, lessons learned and recommendations from a contractor community perspective
- Available at EFCOG Website:  
[www.efcog.org/wg/wm/docs/WM2013\\_WIR-3116\\_LL\\_Rpt\\_FINAL.pdf](http://www.efcog.org/wg/wm/docs/WM2013_WIR-3116_LL_Rpt_FINAL.pdf)

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- **DOE Manual 435.1-1 Process**
  - West Valley Demonstration Project: Authorization for handling of failed vitrification melter as low-level waste
  - Disposal throughout complex of decontaminated tools and other low-risk materials
- **NDAA Section 3116 Process**
  - Savannah River Site: Closure of two waste tanks at SRS and decontaminated salt solution disposal in Saltstone Disposal Facility
  - Idaho National Laboratory: Closure of eleven waste tanks

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- Clear, open and frequent communications between DOE and its regulators and stakeholders are critical to success
- Scoping meetings to promote collaboration during development of the performance assessment (PA) is valuable
- Providing the DOE models used in developing the PA facilitates the effectiveness of the NRC reviews

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- DOE work with its contractors to develop, define and document the scope of consultation with the NRC
- DOE and NRC explore methods to shorten the NRC consultation cycle without compromising safety or agency independence
- DOE work with its contractors to develop, define and document the scope of Section 3116 required monitoring activities

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- DOE and NRC jointly develop and document the monitoring process including agreement on precise meaning of such terms as *noncompliance with performance objectives*
- DOE define key terms used in connection with PA's such as *reasonable expectation, reasonable assurance, and reasonably conservative* for common understanding by all parties