



U.S. DEPARTMENT OF
ENERGY

OFFICE OF
**ENVIRONMENTAL
MANAGEMENT**

DOE Accomplishments and Challenges

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Overview of DOE Actions

- Work across DOE sites to maintain consistency in process – even across different regulations
 - Idaho and Savannah River for NDAA Section 3116
 - Hanford and West Valley for DOE Order 435.1
- Share lessons learned among DOE sites
- Oversight for requirements performed under DOE Order 435.1, DOE's self-regulatory authority under the Atomic Energy Act

HQ Review of Documents

- Reviews technical documents and legal reviews of policy documents to ensure consistency
- Staff raises issues to management, as needed
- Reviews and obtains management approval for other documents required: Performance Assessments, NEPA, DOE O 435.1 Tier I Closure Plan, etc
- Authorizes disposal operations
- Management briefs Secretary on Final Waste Determination

- Idaho TFF has 15 tanks: 4-30,000 gal, 11-300,000gal
- PA existed for facility prior to start of Section 3116, no scoping, updated to analyze new issues
- Draft WD issued 9/2005
- NRC issued RAIs, issued TER 10/2006
- DOE issued final WD 11/2006, 4 small and 7 large tanks grouted within one year
- Awaiting treatment facility start-up to treat remaining tank wastes allowing closure of remaining 4 tanks

Savannah River Site Tank Farms

- F Tank Farm and H Tank Farm have 51 tanks (4 closed):
4 different designs and between 750,000 g to 1.3 Million g
- FTF Section 3116 Determination signed March 2012
 - Tanks 18 & 19 Closed, Tanks 5 & 6 to be closed this summer
 - Continuing emptying and cleaning tanks
- HTF Draft Section 3116 Basis for Determination and Performance Assessment submitted for NRC consultation and public comment in February 2013.
 - Expect NRC request for additional information soon
 - Need Section 3116 Determination by 12/14 to meet FFA commitments – on track for completing this
 - Continuing emptying and cleaning tanks

- Saltstone Section 3116 Determination signed January 2006
 - Saltstone disposal ongoing for low activity portion of tank liquid wastes
 - PA revised in 2009, submitted to NRC and public for comment
 - NRC issued Letter of Concern regarding conclusion that it did not have reasonable assurance that DOE salt waste disposal at the SDF would meet the protection of the general population from releases of radioactivity
 - DOE submitted additional data to support protectiveness of ongoing disposal
 - Modified the mathematical model in conjunction with NRC technical staff recommendations (January 2013 public meeting)
 - Model changes significant enough to require new DOE internal oversight review – ongoing and expected to be complete 9/13
 - Once approved, will be submitted to NRC

Lessons Learned from Idaho and SRS

- Improving Scoping
 - At Idaho there was limited public involvement due to highly technical nature of work and expectations of lack of public interest
 - DOE policy shift during process at SRS, FTF only included regulators and NRC earlier on, now include public at earliest stages and continues to invite public comment at all stages of DOE/NRC interaction
 - Now DOE includes more public interactions and NRC consultation for non-Section 3116 Waste Incidental to Reprocessing decisions at Hanford and West Valley
- Improving documentation of assumptions and references
- Improving documentation of modeling and early discussions of modeling techniques

Challenges

- Sequestration impacts on continued pace of work
- Delay in Salt Waste Processing Facility start-up will slow tank cleaning and closures