

UNREVIEWED WASTE MANAGEMENT QUESTION EVALUATION (UWMQE)

UWMQE Number: SRR-CWDA-2013-00148

1. **Unreviewed Waste Management Question Evaluation**

NOTE: Each question below requires Comment / Justification.

- a. Is the Proposed Activity or New Data outside the bounds of the critical inputs/assumptions of the analyses contained in the WD, PA, CA, approved SA(s), or approved UWMQE(s)? For example, does the proposed activity or new information involve a change to the assumed critical design features for a waste tank/disposal unit design as described in the WD, PA, CA, approved SA(s), or approved UWMQE(s) such as critical inputs/assumptions?

Yes No

Comment / Justification:

The Proposed Activity is disposing of saltstone with no clean cap in the Saltstone Disposal Units (SDUs) identified as Future Disposal Cells (FDCs) in the FY2013 SA (SRR-CWDA-2013-00062). The FY2013 SA considers a minimum clean cap of 2 feet above the final placement of saltstone in each FDC. The FDCs in this UWMQE are SDUs with the SDU 2 design.

- b. Does the New Data involve an increase in the radionuclide inventory or chemical constituents evaluated in the approved WD, PA, CA, approved SA(s), and approved UWMQE(s)?

Yes No

Comment / Justification:

With no clean cap in the FDCs, the potential radionuclide inventory in each FDC may be greater than analyzed in the FY2013 SA. The accompanying sensitivity analysis, SRR-CWDA-2013-00141, considers two projected inventories. The first is based on increasing the projected inventory presented in the FY2013 SA by the fill volume ratio of 1.128 to account for no clean cap. The second is based on the increased fill volume using the inventory presented in SRR-CWDA-2013-00097, which is based on the Waste Acceptance Criteria, Rev. 12, but with the salt solution concentration reduced by a factor of 6 for Cs-135 and I-129 and without the Tc-99 inventory restriction imposed on the FDCs. Chemicals are not addressed in this UWMQE. *KAR 1/2/2014*

Chemical constituents will not change although the chemical inventory would be higher per FDC.

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1. Unreviewed Waste Management Question Evaluation - continued

- c. Would the radionuclide disposal limits need to be changed to implement the proposed activity?

Yes No

Comment / Justification:

This proposed activity addresses the increase fill height of saltstone in the FDCs. The sensitivity analysis SRR-CWDA-2013-00141 utilizes the recommended disposal concentrations presented in SRR-CWDA-2013-00097.

- d. Is it possible that the Proposed Activity or New Data causes the WD, PA, CA, approved SA(s), or approved UWMQE(s) performance objectives to be exceeded?

Yes No

Comment / Justification:

Based on the sensitivity analysis SRR-CWDA-2013-00141, with the reduction by a factor of 6 on the salt solution concentrations for Cs-135 and I-129 cited in WAC, Rev. 12 and without the Tc-99 inventory restriction imposed on the FDCs, the Proposed Activity would not cause the performance objectives to be exceeded. Chemical impacts were not recalculated as the inventory increase is not significant as compared to the FY2013 SDF SA.

KHR 1/2/2014

**UNREVIEWED WASTE MANAGEMENT QUESTION
EVALUATION (UWMQE)**

2. UWMQE Originator

IS the activity within the bounds of the existing
WD, PA, CA or approved SA(s) and approved
UWMQEs?

Yes No

IS a Special Analysis required?

Yes No

Comment / Justification:

The results of the sensitivity analysis SRR-CWDA-2013-00141 justify that this Proposed Activity is within the
bounds and conclusions of the FY2013 SA

An SA is not required as there is not a significant change to the doses within the 1,000 year compliance period.

Check one of the following boxes below and forward to peer reviewer.

- CANCEL the proposed activity. (Document canceled activities as applicable.)
- MODIFY the proposed activity.
- PROCEED to PARC approval (if no SA is required).
- PROCEED with proposed activity; categorical exclusion applies.
- PERFORM Special Analysis.

Originator:

RICHARD E. SHEPPARD
Print

Richard E Sheppard
Signature

Date: 12/19/13 Time: 4:05 pm

**UNREVIEWED WASTE MANAGEMENT QUESTION
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3. UWMQE Peer Reviewer

Concur with the UWMQEO's determination?

Yes



No



Comment / Justification:

After review of the supporting document (SRR-CWDA-2013-00141) and the UWMQE I concur with the conclusions and have no further comments.

Peer Reviewer: _____

Kent H. Rosenberger

Print

Kent H. Rosenberger
Signature

Date: 12/20/2013

UNREVIEWED WASTE MANAGEMENT QUESTION EVALUATION (UWMQE)

4. UWMQE AGCC Reviewer

Is there a legal objection to the UWMQEO's determination?

Yes No

Comment / Justification:

I have no legal objection to the proposed activity with the understanding that: (1) DOE-SR will be informed of the results of this PARC; and (2) any pour height changes must be approved by DOE-SR in revised DSA documents. This activity is authorized by the HQ DOE issued Disposal Authorization Statement, dated May 21, 2012, signed by Mark A. Gilbertson, Deputy Assistant Secretary for Site Restoration. Specifically, the DAS provides: "Significant changes in the disposal technology, disposal unit, or waste form shall be evaluated in accordance with the PA/CA maintenance plan and Unreviewed Waste Management Question (UWMQ) procedures. If required, changes shall be submitted to the LERF for review in accordance with the LERF Program Management Plan (dated September 18, 2000)."

AGCC or Delegate AGCC Thomas Frank England
Print


Signature

Date: 2 Jan 2014

5. UWMQE VP/GC Reviewer

Concur with the UWMQEO's determination?

Yes No N/A

Comment / Justification:

VP/GC was notified of the legal opinion and has no comments.

~~VP/GC~~ or Delegate VP/GC Thomas Frank England
Print


Signature

Date: 2 Jan 2014

UNREVIEWED WASTE MANAGEMENT QUESTION EVALUATION (UWMQE)

6. PARC Chairman

IS the activity consistent with the existing WD? Yes No

IS a Special Analysis required? Yes No

Comment / Justification:

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IF a Special Analysis is required, **INDICATE** the follow-up action by checking one of the following boxes below and return to the UWMQE Originator

CANCEL the proposed activity. (Document canceled activities as applicable.)

MODIFY the proposed activity to attempt to eliminate the SA.

PERFORM SA.

PARC Chairman
or Designee:

Michael N. Borders
Print

per telecon 
Signature

Date: 1/6/2014