

Recommendation 371

Prepare Required Regulatory Decommissioning Documents in Parallel with the Deactivation Process

Background

The deactivation and decommissioning (D&D) process includes the removal of hazardous and radioactive materials from excess facilities to protect workers, public health and safety, and the environment. D&D is a two-step process in which the Department of Energy (DOE), first, deactivates a facility by placing it in a safe and stable condition by eliminating or reducing residual hazards then, second, decommissions the facility by transitioning it to its end state by decontamination and/or dismantlement prior to demolition or entombment.¹ Because D&D involves the handling of hazardous and radioactive materials, the process presents risks that must be addressed from safety, programmatic, environmental, and technological standpoints. As such, the D&D of a facility requires extensive and time-consuming regulatory review and approval.

In 2019, the Savannah River Site (SRS) Citizens Advisory Board (CAB) adopted and DOE accepted Recommendation 364^{2,3}, which recommended that DOE accelerate the D&D of building 235-F. As part of the recommendation, the CAB recommended and DOE accepted a plan to initiate the preparation of required regulatory decommissioning documents in parallel with the deactivation process. The recommendation asserted that deactivation with parallel preparation of regulatory decommissioning documents will accelerate D&D resulting in reduced risk to SRS employees and the citizens of neighboring communities, reduced costs related to decreased surveillance and maintenance costs, and reduced costs related to nearer-term decommissioning.

SRS currently has approximately 800 excess facilities that may be deactivated and decommissioned in the near- to midterm. It is reasonable to conclude that additional time, risk, and cost reductions may be achieved by adding a similar process of parallel deactivation and regulatory decommissioning document preparation to the D&D process of these facilities.

Recommendation

The SRS Citizens Advisory Board recommends that excess nuclear facilities rated as hazard category 2 or 3, that DOE initiates the preparation of required regulatory decommissioning documents in parallel with the deactivation process when engaging in future D&D processes at SRS.

¹ "Deactivation & Decommissioning (D&D)," Office of Environmental Management:
<https://www.energy.gov/em/deactivation-decommissioning-dd>

² Recommendation 364, "Accelerated Deactivation and Decommissioning of 235-F":
<https://cab.srs.gov/library/recommendations/Rec-364-Accelerated-235F.pdf>

³ Department of Energy-SR Response to Recommendation 364:
https://cab.srs.gov/library/responses/DOE_Response_to_CAB_Rec_364.pdf