



Savannah River Site Citizens Advisory Board

Recommendation 189 Performance Management Plan 2004

Background

In August 2002, the Savannah River Site (SRS) published the SRS Environmental Management (EM) Program Performance Management Plan (2002 PMP). This document described the approach SRS would implement to accelerate the SRS EM cleanup program. The 2002 PMP contained 14 initiatives designed to reduce environmental and health risk, cut cost, and accelerate cleanup but did not include all work scope or annual funding projections (Ref. 1). There have been significant changes since issuance of the 2002 PMP. The 2004 PMP expands on the acceleration initiatives and provides a comprehensive approach to the EM cleanup at SRS. The 2004 PMP includes all EM work scope, is based on the Project Baseline Summaries (PBS) used in the budget process, and begins with a risk-based end state protective of the environment and health risks defined for each major area of the SRS. The 2004 PMP is the central document in the SRS EM lifecycle and near-term planning activities (Ref. 2). The 2004 PMP provides a brief discussion on the programmatic risks identified as well as alternatives, environmental and health risk mitigation strategies, and open issues still to be resolved. SRS recognizes that there is some programmatic risk that some of the objectives/goals and program plans established to achieve accelerated cleanup of SRS might not be realized. If these programmatic risks materialize, SRS will have to identify alternatives to minimize impact to cost or schedule baselines.

Comment

The SRS Citizens Advisory Board (CAB) supports the PMP concept but is concerned about the overall accountability of the PMP process. It appears to be too easy for DOE to simply issue a revised PMP if key assumptions do not materialize instead of applying the necessary resources to make sure that the assumptions remain valid. For example, many of the PMP strategies rely on the availability of a Federal Repository. However, the Nuclear Regulatory Commission (NRC) has recently warned DOE that if it continues to use existing policies, procedures, methods and practices at the same level of implementation and rigor, the license application for the Federal Repository (Yucca Mountain) may be delayed, thus increasing programmatic risks (Ref. 3). Instead of waiting to see what programmatic risks materialize before alternatives are identified, the SRS CAB would like to see additional detail on mitigation strategies now. The PMP discusses the potential for a \$180 million savings related to performance assessment modeling for Pu-238 disposal alternatives. If these disposal options are protective of human health and the environment, then they need to be pursued by SRS.

Recommendation

The SRS CAB is interested in strengthening the PMP process and therefore recommends the following:

1. SRS develop a section on accountability in the PMP and discuss how key assumptions will be periodically revalidated.
2. DOE-HQ work aggressively with NRC to insure the licensing of Yucca Mountain to meet the PMP objectives. DOE-HQ prioritize waste acceptance for SRS vitrified High-Level Waste (HLW) and spent fuel. In addition, DOE-HQ provide a schedule and implementation plan for the SRS shipments.
3. SRS provide alternatives (back-up plans) for these key assumptions: Yucca Mountain and Pu 238 disposal alternatives identified in the PMP and whenever there are reasonable expectations that any other significant assumptions will require revision.
4. SRS should present additional detail on the performance assessment modeling for Pu-238 disposal alternatives to the Waste Management Committee by September 27, 2004.

References

1. SRS Environmental Management Program Performance Plan, June 2002.
2. SRS Environmental Management Program Performance Plan (Predecisional Draft), April 2004.
3. NRC News, "NRC Issues Report on Quality of Technical Information Under Development by DOE for Yucca Mountain Application", April 13, 2004.

Agency Responses

[Department of Energy-SR](#)