

#### Department of Energy

Savannah River Operations Office P.O. Box A Aiken, South Carolina 29802

#### MAY 0 3 2006

Ms. Karen Patterson, Chair Savannah River Site Citizens Advisory Board 1103 Conger Drive Aiken, SC 29803

Dear Ms. Patterson:

SUBJECT: Savannah River Site (SRS) Citizens Advisory Board (CAB) Recommendation 230, Salt Waste Processing Facility (SWPF) Decision – High Level Waste (HLW) Disposition Program System (Your letter, 3/29/06)

I have reviewed the subject recommendation regarding the SRS liquid radioactive waste treatment and disposal system. I accept the recommendation and my responses to the five parts of Recommendation 230 are as follows.

## 1. Department of Energy Savannah River Operations Office (DOE-SR) recommit to starting up the deliquification, dissolution, and adjustment process by July 1, 2006, and closing tanks 18 and 19 by the end of Fiscal Year 07.

Pending reaching a successful agreement with the State of South Carolina on a revised implementation approach for salt waste processing and receipt of the necessary permits that allow the disposal of treated salt waste, the DOE expects to start disposal of salt waste in July 2006.

DOE is also working closely with the Nuclear Regulatory Commission (as part of the Section 3116 consultation process) and the State of South Carolina to complete the Waste Determination and other documentation required to support closure of tanks 18 and 19. Pending the successful completion of this process, DOE expects to complete closure activities for Tanks 18 and 19 in the 2007 time frame.

### 2. DOE-SR adopt quantitative risk and cost-benefit analysis procedures and documentation as part of the decision making in HLW management.

Following the recent decision to enhance the preliminary design of the SWPF that resulted in impacts to DOE's plans for cleanup of the liquid radioactive waste system, DOE identified as a lesson learned the need to ensure all appropriate factors are considered in making critical decisions. These factors include the results of appropriate risk and cost-benefit analyses as well as stakeholder input. DOE has in place processes and tools that can be brought to bear on significant programmatic decisions such as these including risk assessments, cost-benefit analyses, integrated system plans, and life-cycle projections. In addition, DOE believes it is critical we provide more timely and detailed communication with key stakeholders (such as the CAB) on these types of issues so that your input can inform DOE's decision making process. By properly applying the tools and processes we have available, the bases and logic for critical decisions will become apparent.

### 3. DOE-SR adopt a systems approach in decision making in HLW management and perform risk and cost-benefit analyses on all affected systems influenced by that decision.

As noted in the response to part 2 of this recommendation, DOE and Washington Savannah River Company (WSRC) utilize a detailed integrated system planning process for making decisions on management of the liquid radioactive waste system. This planning process includes a hierarchy of plans that progress from near term operational plans through high level system plans into life cycle plans. These plans support development of DOE's long range project execution plan which includes life cycle cost and schedule projections.

DOE and WSRC are in the process of updating the risk assessment for the liquid radioactive waste system. The risk assessment looks at all parts of the liquid radioactive waste system and identifies potential risks that could impact the successful completion of the mission of the system. Risks are evaluated for their potential to impact cost, schedule, and safety and mitigation strategies are developed. When finalized later this year, this assessment will be a key input for future decision making.

# 4. DOE-SR consider other possible options for increasing tank capacity during the period prior to operation of the SWPF. Such options could include replacing Tank 50, the Saltstone feed tank, with an above ground storage tank and returning Tank 50 to high level waste service.

As part of the development of the revised approach to implementation of interim waste processing, DOE and WSRC are evaluating options for providing the tank space necessary to support a number of objectives prior to the startup of SWPF. DOE expects to finalize its approach on tank space management over the next few months and a revised system plan will be issued to document the details of such decisions.

#### 5. DOE commit to sufficient funding for satisfactory completion of the SWPF project and the key corollary HLW treatment operations.

As you know, DOE receives funds on an annual basis as provided for in the appropriations made by Congress. However, it is DOE's intent to seek the funding required annually via the federal budget process to ensure successful completion of the SWPF project and the operations of the related waste treatment facilities. The treatment and disposition of the liquid tank wastes is one of the highest priorities within the cleanup mission at SRS. DOE will keep the Waste Management Committee apprised of the status of the budgets for these critical programs on a routine basis.

Thank you for your recommendation on these very important activities at SRS. If you have any questions, please contact me or Bill Clark, of my staff, at 803-208-0231.

Sincerely,

Em M. all Jeffrey M. Allison

Manager

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