

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

OCT 1 8 1996

Mr. Robert Slay Savannah River Citizens Advisory Board P.O. Box 192 Beech Island, South Carolina 29842

Dear Mr. Slay;

# SUBJECT: Savannah River Operations Office (SR) Citizens Advisory Board (CAB) Recommendation Number 23 Regarding the SR Ten Year Plan (TYP)

Thank you for submitting the subject recommendation. Your input complements the goals of the SR TYP to accelerate the elimination of the most urgent risks at SR and will enhance the quality of the plan when it is revised in final form in the coming months.

Responses to your specific recommendations are provided as follows:

#### Recommendation 23-1

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The concept of providing adequate funding early in the decade to permit reductions of mortgage and support costs is essential to success of the TYP implementation. Our ability to achieve early mortgage reduction is dependent upon the total funding made available to the department for these programs. It is imperative that our sponsors and external stakeholders fully support this plan with constant outyear funding for it to be successful. A basic tenet of the plan is that each site can "reinvest" savings as its mortgage reduction efforts are implemented.

#### Recommendation 23-2

We agree that the Department of Energy (DOE) needs to be sensitive to concerns identified by DOE stakeholders and the public at large. It is DOE policy that stakeholder values and input be considered in all major decisions concerning the future of the Savannah River Site (SRS) as well as other DOE sites. We are committed to continually working with the public to identify and resolve issues in a timely manner.

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### Recommendation 23-3

DOE recognizes the importance of cooperation between the Environmental Management (EM) TYP and the Material Disposition Program. The TYP has provided a vehicle to improve the cooperation and integration between these two major programs. Specifically, the TYP clearly identifies what materials (excess to weapons needs) are potential candidates for stabilization, storage, and preparation for disposition (either as product or as waste) at SRS. The Office of Materials Disposition has received copies of all DOE TYPs. Staff from the Materials Disposition Program will be involved in the development of the EM TYP. DOE is committed to establish coordinated programs which maximize risk reduction and cost efficiencies.

#### Recommendation 23-4

SR agrees that the Transuranic (TRU) waste issue deserves attention in the ten year window and we are trying to incorporate the CAB's concerns. While we begin segregating TRU waste that can be shipped to the Waste Isolation Pilot Project (WIPP) in Carlsbad New Mexico, we will also be applying available funds to evaluating existing and identifying additional technologies to treat the remaining TRU waste in the most timely and cost effective manner. DOE is also currently revisiting its TRU waste strategy, which will undergo additional stakeholder review and comment. We will review our specific proposals with you as they are being developed.

#### Recommendation 23-5

The Record of Decision (ROD) for the Foreign Research Reactor (FRR) Environmental Impact Statement (EIS) defined the DOE's approach toward disposition of FRR Spent Nuclear Fuel (SNF). In summary, DOE is phasing out its chemical separation activities, so it has embarked on an accelerated program to identify, develop, and demonstrate one or more alternative (to chemical processing) technologies to produce an acceptable waste form for ultimate disposition. The work scope required to implement the alternate technology program is contained in the current TYP. The ROD commits DOE to choose the preferred technology no later than 1999. This date is prior to the proposed completion date of 2002 for stabilization of at-risk materials outlined in the Interim Management of Nuclear Material EIS and assumed in base case for the TYP. Therefore reprocessing capability will be available at the time of the decision and the canyon programs can be adjusted if study results cause a change in the spent fuel disposition strategy. (If the separation facilities at SRS are selected to stabilize off-site plutonium, operation of at least one canyon could continue beyond 2002).

As documented in the FRR ROD, in addition to the alternative technologies work, a DOE Headquarters study is being undertaken to evaluate the non-proliferation issues associated with processing SNF. This study is to be completed in 1997 and will also be factored into the final decision on how best to disposition FRR SNF. The current SNF Strategic Plan is that processing will only be an option for fuels which pose a health and safety risk, or can not be cost effectively treated via an alternate technology. The DOE TYP is based on the premise

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that direct disposal of the essentially untreated FRR SNF will be technicality acceptable to the Nuclear Regulatory Commission. The TYP outlines a proposal to develop a privatized facility to receive, package, and store the FRR SNF in lieu of the current wet storage basins (Receiving Basin for Offsite Fuels and L-Basin). As proposed, the facility would be authorized in 1998 and operational by 2002. The TYP will be revised, if necessary, based on the results of the alternative technology program and non-proliferation study.

#### Recommendation 23-6

We are in agreement with the SR CAB's position that high level waste canister loading should be optimized to the design basis to assure facility efficiency and accelerate completion of the high level waste mission. We have already taken actions to optimize canister loading. Improvements in glass pour height monitoring technology, and the desire to put more glass in each canister, have enabled the Defense Waste Processing Facility to fill canisters above the originally intended fill height resulting in more pounds of glass per canister. Therefore, while the glass processing rate remains the same, the total number of canisters that will be produced actually decreases slightly. Additionally, efficiencies for waste loading may be realized with the addition of precipitate feed which will not be available until resolution of the benzene generation issue at the In-Tank Precipitation Facility.

#### Recommendation 23-7

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DOE appreciates the CAB's concern relative to ultimate disposition of wastes in interim storage and new waste that may be shipped to SRS. Please be assured that resolution of this and related issues is a clear priority for DOE. The DOE has prepared a Waste Management Programmatic EIS that evaluates different scenarios for storage and disposition of low level, mixed and TRU waste. The intersite opportunities identified in the TYP for SR to receive certain waste streams at SRS will receive full National Environmental Policy Act review before decisions are reached. Assuring mutuality and equability among the sites is of primary consideration in the proposals in

Yucca Mountain, Nevada is scheduled to receive spent fuel and vitrified high level waste upon resolution of certain issues among congress, various states and federal departments. Options for disposition of surplus plutonium, low level waste, and mixed waste have not yet been fully developed. We will keep the CAB informed as new information is available on progress of these decisions. Greater than Class C Waste from commercial reactors will be disposed of in facilities in accordance with the Low Level Radioactive Waste Amendments Act. Decisions on which DOE disposal facilities will be utilized is a national level decision for which strategies have not yet been fully developed. Additional clarification on these issues will be addressed in the final TYP.

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Recommendation 23-8

SRS accepts the CAB's recommendation to include program prioritization in the TYP. A plan section will be added in the next revision, currently scheduled for November 15, in response to this recommendation.

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We sincerely appreciate the input of the SR CAB in all matters as we work together to accomplish the missions of our site. Questions on this response may be directed to Chuck Borup of my staff, at extension (803) 725-1579.

Sincerely

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Mario P. Fiori Manager

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