

John T. Conway, Chairman
A.J. Eggenberger, Vice Chairman
Joseph J. DiNunno
Herbert John Cecil Kouts
John E. Mansfield

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004-2901
(202) 208-6400



October 20, 1998

Ms. Ann Loadholt
Chairperson
Savannah River Site
Citizens Advisory Board
P.O. Box 365
Barnwell, SC 29812

Dear Ms. Loadholt:

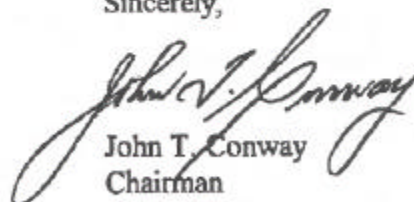
Thank you for your letter of September 30, 1998, concerning the views of the Savannah River Site (SRS) Citizens Advisory Board (CAB) relative to draft Department of Energy (DOE) Order 435.1, *Radioactive Waste Management*.

The Defense Nuclear Facilities Safety Board (Board) has reviewed the comments the SRS CAB provided to DOE as Recommendation 66 and found them to be in line with the basic thrust of comments provided to DOE by the Board in a letter dated October 8, 1998. A copy of that letter is enclosed. The Board will be working with DOE to see that the points raised by the draft Order and its associated documents are appropriately addressed. The Board commends the SRS CAB for its attention to this important draft safety-related Order and manual.

Relative to your Recommendation G-5, the Board, in accordance with its statutory authority, will continue its independent oversight of waste management practices at Defense Nuclear Facilities. That authority does not extend to all DOE nuclear facilities for all DOE operational sites.

If you have any questions concerning this matter, please feel free to contact me at (202) 208-6400.

Sincerely,


John T. Conway
Chairman

Enclosure

c: Mr. James M. Owendoff
Mr. Mark B. Whitaker, Jr.
Mr. Greg Rudy

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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700, Washington, D.C. 20004-2901
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October 8, 1998

Mr. James M. Owendoff
Acting Assistant Secretary for
Environmental Management
Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Mr. Owendoff:

The Defense Nuclear Facilities Safety Board (Board) has examined the recent draft of Department of Energy (DOE) Order 435.1, *Radioactive Waste Management*, and its associated manual, guidance, and technical basis documentation. The enclosed comments are provided for your review and consideration.

With certain notable exceptions, the Order and its associated manual address reasonably well general requirements for the management of radioactive wastes. However, the guidance documents are too vague in many instances, and do not allow for uniform implementation of safety-related measures in all instances. For example, important safety issues, including venting of transuranic waste drums, storage of pyrophoric materials as waste, storage of wastes in areas not designed for waste storage, actions related to leaky tank systems, and conditions necessary to allow continued use of single-wall tank systems for high-level waste, are inadequately addressed. Additionally, requirements and guidance necessary to address issues raised by Board Recommendation 94-2 are inadequately covered or missing. This includes guidance for performance assessment (PA) and composite analysis (CA), and for changes made to the requirements for PAs and CAs.

The Board believes the guidance needs to be appropriately revised in both focus and scope so that a more concise, clear, and accurate document can be provided for review. In addition, the objective paragraph of the Order should be modified to clearly reflect DOE's intention to manage radioactive waste generation, treatment, storage, and disposal as a continuum, consistent with the principles currently embodied in the management of nonradioactive hazardous wastes. Waste management is to begin with design using waste minimization as an objective. These principles include: (1) incorporating radioactive waste management concerns into facility design; (2) emphasizing pollution prevention where feasible; (3) encompassing treatment and recycling where beneficial; (4) ensuring that all of DOE is responsible for the cradle to grave management of radioactive wastes, including safe interim storage and environmentally sound disposition. These principles should also be reflected in the accompanying documents making up this directive as well as in companion directives (e.g., DOE Order 420.1, *Facility Design* and DOE Order 430.1, *Life Cycle Assets Management*).

Mr. James M. Owendoff

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The Board has designated Mr. Steven Stokes to lead the review effort by the Board's staff and to continue technical dialogue with the DOE developer of this Order. If you have questions on this matter, please do not hesitate to call me.

Sincerely,



John T. Conway
Chairman

c: Mr. Mark B. Whitaker, Jr.

Enclosure