

Waste Management Working Group 1998 Annual Report to the Directors

I. Executive Summary

During 1998 the Waste Management Working Group (WMWG) limited activities to four areas:

- Review Draft DOE Order 435.1 *Waste Management* for DOE/EM.
- Review DOE Waste Management Programmatic Environmental Impact Statement (WMPEIS) and Draft Record of Decisions for DOE/EM.
- Network between sites to reduce the time and cost to solve site-specific issues.
- Monitor and disseminate information on emerging urgent issues in waste management.

The working group meets a minimum of once annually in conjunction with the Waste Management '99 Symposium to avoid unnecessary travel and meeting expenses. The group met on March 3, 1998 and discussed various topics of interest. Presenters at the meeting included both DOE and member staff.

During the year, comments on the Draft DOE Order 435.1 and the WMPEIS were provided to DOE as requested and several issues including waste container bar-coding and tracking, radiation protection of waste workers, and waste container certification were worked between site members. Numerous important workshops were held by the DOE so the group had no reason to hold additional workshops.

II. Purpose

The purpose of the WMWG is to promote excellence in waste management with emphasis on safe, compliant and cost-effective approaches, through exchange of information on lessons learned, emerging issues and proposed DOE requirements and initiatives.

III. Membership

The current membership of the WMWG is posted on the EFCOG web site at efcog.com. By limiting the issues and therefore the interested membership, the members are typically individuals actively involved in day-to-day waste management activities. One of the challenges the group faces is rapid turnover in waste management personnel across the complex. Over 50% of the group's membership was either replaced or reassigned during the year including the chair and co-chair of the group. The group now has representation from each major DOE site and most of the smaller sites and laboratories. The group continues to suffer somewhat from the absence of waste management operations supervisors that are closest to the operational issues. An effort will be made during 1999 identify and include these operations supervisors.

IV. Objectives

Specific objectives for 1998 were to:

- Review Draft DOE Order 435.1 *Waste Management* for DOE/EM.
- Review DOE Waste Management Programmatic Environmental Impact Statement and Draft Record of Decisions for DOE/EM.
- Network between sites to reduce the time and cost to solve site-specific issues.
- Monitor and disseminate information on emerging urgent issues in waste management.

These objectives were met and additional areas have been identified for 1999.

V. Status

The group met again on March 2, 1999 at the Waste Management '99 Symposium in Tucson, Arizona and identified new issues and areas of focus for 1999. The group is still awaiting the release of DOE Order 435.1 at which point the group will assist each other in implementation of the new requirements. The group continues to discuss planned approaches and unresolved issues with the order. Also, the group is awaiting the release of the low level and mixed low level radioactive waste Records of Decision.

The group is considering the following additional issues for focus in 1999:

- Legacy Waste Worker Radiation Protection - Across the complex, waste management operations are bearing the brunt of Price Anderson Amendments Act enforcement actions. The nature of legacy waste operations leads to substantially higher risk of worker radiation exposure due to the poor characterization of legacy waste and materials. Several sites have had either unplanned radiation exposures or near misses. The group will focus on advanced work planning and control to hopefully reduce the risk of unplanned exposures.
- Radiation Protection Support for Waste Operations – Although related to the work planning issues, there is concern at several sites about “matrixed” radiation protection support. There appears to be a paradox when radiation protection support is matrixed from a support organization to maintain “independence” while Integrated Safety Management calls for integration of all aspects of safety into the line operations. There is concern that RP personnel may not be familiar enough with the hazards and processes of day-to-day waste operations to provide adequate support. The group will review the issue and benchmark approaches across the complex in support of waste operations supervisors.
- Coordination of vendor/supplier audits and assessments – Commercial treatment, storage and disposal (TSD) facilities and vendors of materials used for radioactive waste sampling, transportation and disposal still complain about the endless DOE contractor audits. Previous attempts to reduce this costly burden on both the contractors and suppliers have only been partially successful due to legal and site-specific issues. With the release of the Broad Spectrum Procurement for mixed low

level radioactive waste and the implementation of 10CFR830.120 vendor certification, additional audits and assessments are underway with each site conducting their own audit. The group will review the issue and provide recommendations to DOE and the Directors.

- Encourage commercial radioactive waste treatment – Several commercial suppliers are attempting to develop capabilities to support DOE’s need for mixed low level radioactive waste treatment. In cooperation with the Mixed Waste Focus Area, the group intends to facilitate the dissemination of information on commercial waste treatment capabilities. Due to subtle differences in the waste composition, subject matter experts must spend considerable time interfacing with the vendor and other sites to identify viable treatment technologies for their waste. The group will encourage the growth and interaction of a network of mixed waste treatment subject matter experts to reduce the time and frustration in identifying commercial treatment options. The group invited successful bidders on the Broad Spectrum Procurement to the March 2, 1999 meeting and they presented their companies plans and current capabilities.

VI. Cost/Benefit Determination

The total incremental cost of the WMWG is less than \$30,000 annually and is inconsequential to the normal costs of the waste management activities performed by the members. In essence, the WMWG is not something the members do, but rather the way we do this part of our jobs. Driven by performance measures, safety management, and regulatory issues the members have little time to invest in studying issues or implementing new initiatives. Also, the group does not have the authority to task members or subject matter experts. Therefore the group considers only issues, which when resolved, return a high value on the time invested.

VII. Lessons Learned

Lessons learned are shared on an informal basis between site members and are not tracked or recorded by the group at the request of the membership. This promotes the open discussion of sometimes sensitive regulatory and management issues. Areas of shared lessons included transportation container inspection, waste tracking systems, and radioactive contamination release criteria application.

VIII. Recommendations

The membership has concluded that the annual meeting is not adequate time to address this years issues and has requested at least one additional meeting along with monthly conference calls. It is likely that some subgroups will be needed to address the specific issues identified. It is recommended that the group continue for the indefinite future with increased interaction with DOE/EM and increased participation from waste management operations supervisors.

IX. Issues

Waste operations supervisors are under incredible demand at most sites and typically need upper management encouragement to participate until they recognize the value of membership in this group. Directors could help by identifying the proper membership at their sites and encouraging them to join the group.