

Waste Management Working Group 1999 Annual Report to the Directors March 2000

Executive Summary

During 1999 the Waste Management Working Group (WMWG) limited activities to four areas:

- Review DOE Order 435.1 Waste Management Training Materials for DOE/EM.
- Review DOE Waste Management Programmatic Environmental Impact Statement (WMPEIS) and 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 Symposium to avoid unnecessary travel and meeting expenses.

The group met 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 objectives were established for the year focusing on the release of DOE Order 435.1. The group discussed planned approaches and unresolved issues with the order. Also, the group was awaiting the release of the low level and mixed low level radioactive waste Records of Decision.

During the year, several members met with NETO to review training materials for DOE Order 435.1. It is believed that the quality of the training was significantly enhanced by this effort.

Networking between members is still the primary focus of the working group. The members shared information between sites on container selection and qualification, waste profile preparation, treatment issues, and generator protocols. Also, radiation protection of waste workers, and waste container certification were worked between site members. The pollution prevention workshop was held in conjunction with the Energy Efficiency Working Group rather than the WMWG because of location and synergies. Several other meetings and workshops were held by the DOE so the group had no reason to hold additional workshops.

The WMWG chairman also presented at the Chemical Safety Working Group Workshop on the issues surrounding transition of waste management to the generators at non-EM sites.

Conference calls were conducted as needed for group communications.

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.

Membership

The current membership of the WMWG is posted on the EFCOG web site at <http://www.efcog.org>.

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. The group now has representation from each major DOE site and most of the smaller sites and laboratories.

Objectives

Specific objectives for 1999 were to:

- Facilitate Implementation of DOE Order 435.1 *Waste Management* for DOE
- Facilitate Implementation of the DOE Waste Management Programmatic Environmental Impact Statement and 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 remain essentially the same for 2000.

Status

The group met again on February 29, 2000 and discussed various topics of interest. Presenters at the meeting included both DOE and member staff. The group is considering the following additional issues for focus in 2000:

- 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.
- PAAA Quality Assurance requirements will be enforced for all facilities and activities that have the potential for radiological harm. This will significantly impact radioactive waste operations, especially those activities conducted in less-than-category III radiological facilities. The group will attempt to define “graded approaches” that are acceptable to EH-1 PAAA enforcement entities that may be applied to waste operations.
- 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 DOE in identifying commercial treatment options. The group supported DOE workshops to facilitate communications and networking between mixed waste treatment personnel. The workshop was very productive, especially for sites with small quantities of mixed waste.

Cost/Benefit Determination

The total incremental cost to all members 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 (to the members) on the time invested.

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 sensitive regulatory and management issues. Areas of shared lessons included transportation container inspection, waste tracking systems, and radioactive contamination release criteria application, and potential enforcement actions.

Recommendations

The membership has concluded that the annual meeting is not adequate time to address this year's issues but travel and budget restrictions precluded additional meetings. Conference calls and electronic mail will be the standard mode of communication.

Sub-groups may be established to address specific issues with DOE Order 435.1, vendor qualifications and audits, and implementation of the WMPEIS Records-or-Decisions.

Although it is acknowledged that EFCOG working groups need to show benefit to DOE, the working group still stands on a belief that DOE indirectly benefits from this working group through safer, more efficient waste operations and that no direct products need be delivered to the DOE. It is recommended that the group continue for the indefinite future with close interaction with DOE/EM on specified objectives.

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. Also, during site contract transitions and subsequent

management reassignments, new waste operations managers should be identified to the working group.

EFCOG Director meetings with DOE/EM (Turi) resulted in tasks which were not agreed upon by the WMWG nor was the WMWG directly tasked to address the questions. The EFCOG Directors were asked to respond to the questions but failed to generate the needed information. These questions remain open and reflect poorly upon the WMWG, but are not of a nature that the WMWG would typically field them. The EFCOG Directors need to answer the questions that were asked by Turi. Future meetings with the WMWG DOE sponsors should be made only with the presence of the WMWG chairman to avoid future unfulfilled commitments.