

# U.S. DOE's Radioactive Waste Management Order 435.1 Update

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# *Introduction*

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- History
- Original 1996 Complex-Wide Review
- How DOE Order 435.1, Radioactive Waste Management, was created
- Where we are now / where we are going
- Update to the Complex-Wide Review
- Responses & Preliminary Findings



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# History

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- DOE Order 5820.2A issued September 1988
- Several attempts to revise 5820.2A
- DNFSB Recommendation 94-2
  - LLW forecasting and capacity planning inadequate
  - Characterization of LLW ineffective
  - LLW with no identified path to disposal in storage indefinitely
  - Storage conditions for LLW inadequate
  - Some LLW generated with no path for disposition
  - Performance assessments unapproved and lacking adequate requirements
- DNFSB 94-2 Required DOE to conduct a complex-wide review



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# ***How 435.1 was Created (continued)***

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- Identification of waste management functions and activities based on standard systems engineering approaches
- Assess hazards to workers, public, and environment by performing the functions
- Develop Controls -- assess existing requirements and develop requirements to address significant hazards
  - Identify needed requirement areas
  - Identify existing and external requirement sources; applicable Federal requirements; other Federal requirements (e.g., 10 CFR Part 61); International standards; and industry consensus standards
- Evaluate adequacy of requirements / any additional requirements
- Document /implement



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# Where We are Now

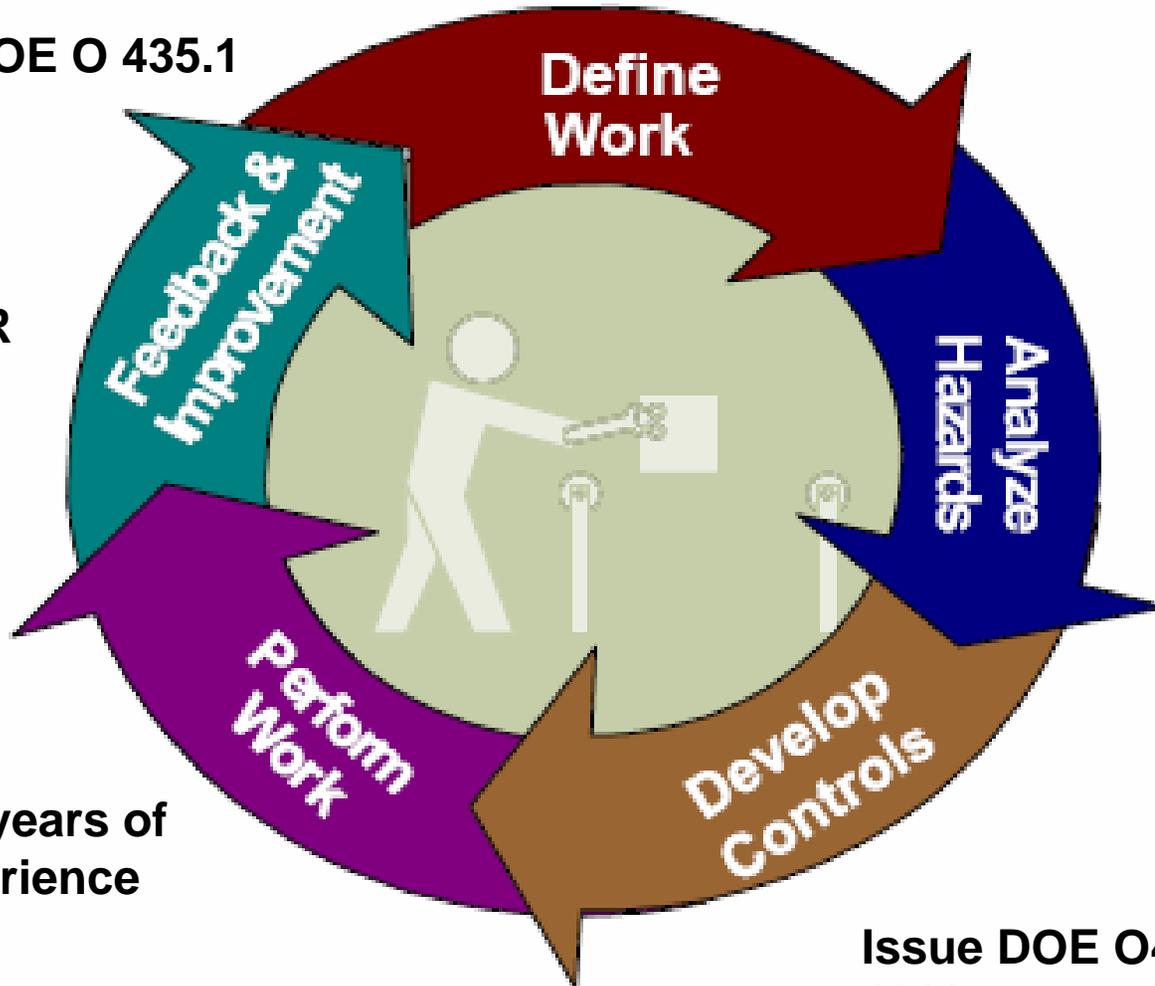
DNFSB 94-2

Update DOE O 435.1

2010 CWR

1996 CWR

>10 years of  
experience



Issue DOE O435.1  
1999



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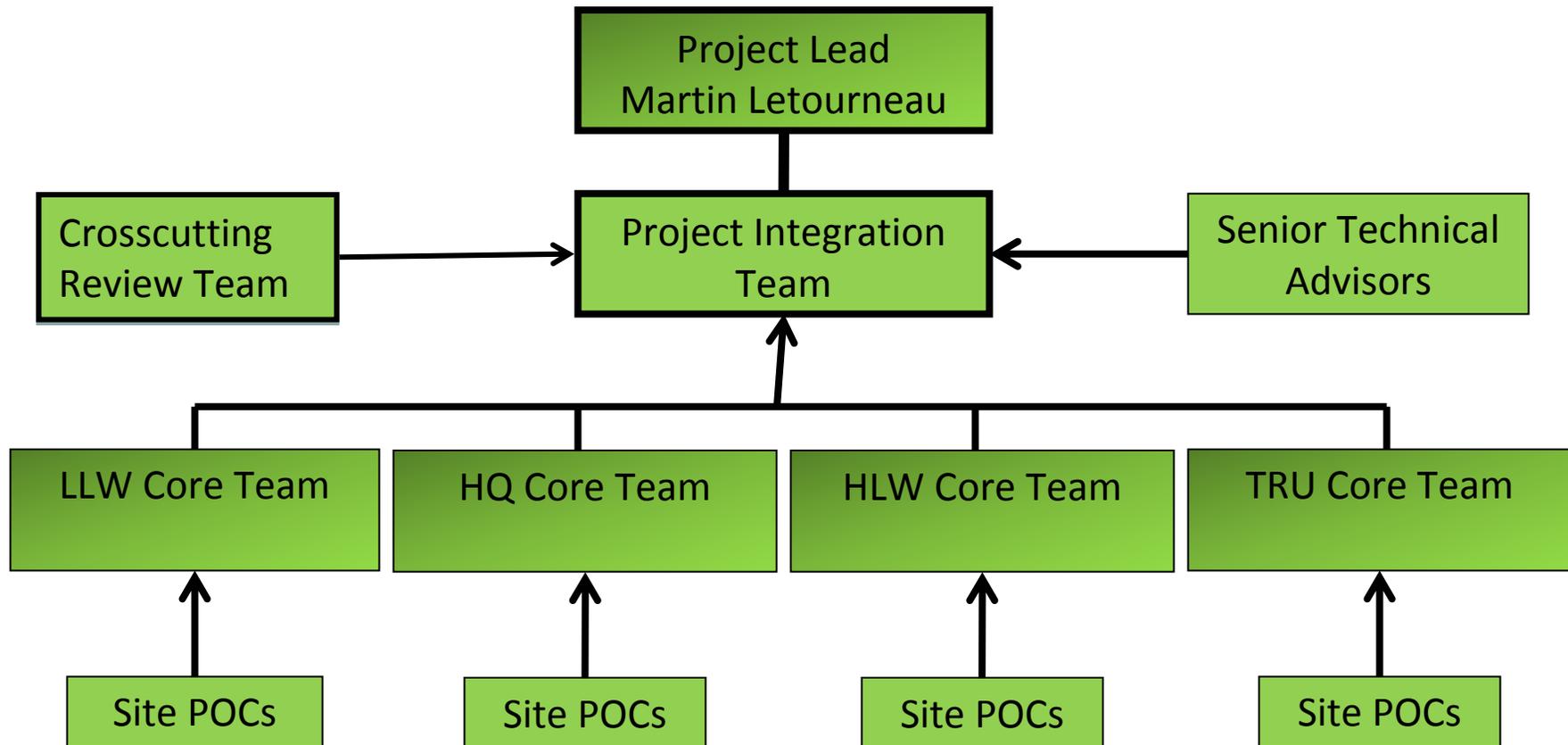
# *Where We Are Going*

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- Over 10 years since first CWR completed
- 10 years experience implementing 435.1
- Opportunity to re-assess and evaluate our progress
  - What issues still exist
  - What have been the successes
- Consistent with feedback and continuous improvement step of ISMS
- Good first step for evaluating update needs for 435.1
- Began planning in January 2008; endorsed by EM-1



# CWR/435.1 Update Project Team



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# *Survey Results and Core Team Evaluations*

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- Over 14,000 individual responses received
  - 100 Percent Site and Program response
- Core Team Evaluation of results
  - **Successes** – Achievement of complex-wide mission, goals or milestones
  - **Best Practices** – Activities and approaches that demonstrated effective implementation of DOE O 435.1
  - **Lessons Learned** – Work practices or approaches shared to promote repeat application or avoid recurrence
  - **Areas of Improvement** – Specific areas of DOE O 435.1 that may not be fully implemented or suggested revisions, additions, or clarifications to DOE O435.1



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# *Sources of input*

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- 2010 Complex-Wide Review
- Mission Needs Assessment
- 2001 Draft Mark-Up of DOE M 435.1
- Programmatic Issues Identified during LFRG PA/CA Reviews
- Commercial Practices as regulated by EPA, NRC, IAEA, States
- Others such as PA Community of Practice and LFRG

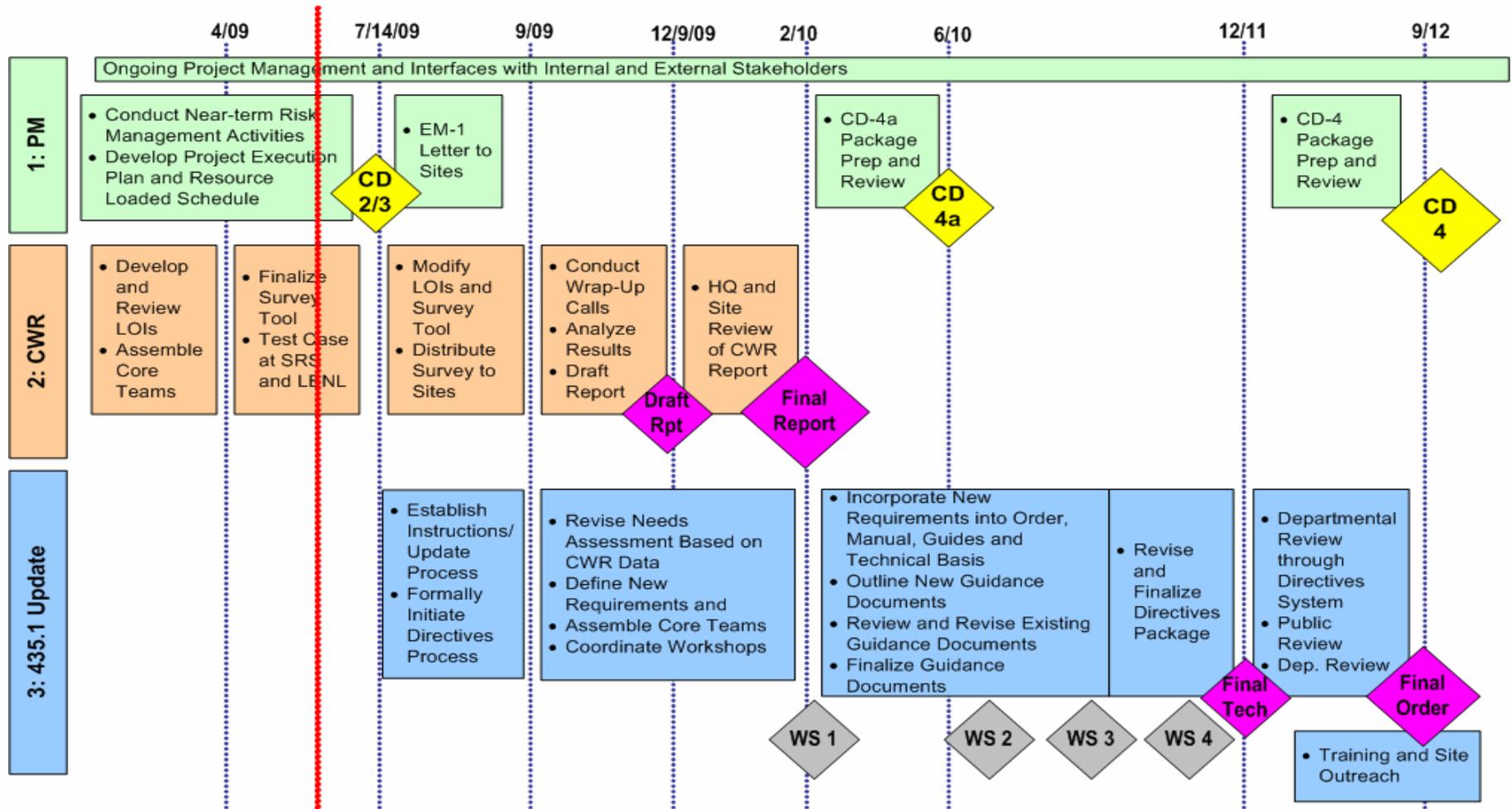


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# CWR and 435.1 Update Integrated Schedule



Current Project Status

Draft – Pre Decisional Document to support Deliberative Process



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# ***Path Forward (continued)***

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- Development of methodologies for updating 435.1
- Establishment of chapter-specific Core Teams
- Development of algorithm for processing input information
  - Lesson learned: need to reduce number of “passes”
- Workshops
- Present proposed changes to senior management and General Counsel
- Possibility of rulemaking for part or all of 435.1

