



Section 3116 Activities at the Savannah River Site

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Section 3116 Documentation

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NDA Section 3116 (a)

- **Section 3116 (a) states that Secretary of Energy can **determine** that radioactive waste resulting from the reprocessing of nuclear fuel is not “high-level radioactive waste” if it meets specific criteria**
 - We now speak of “Waste Determinations”
- **The Secretary must **consult** with the Nuclear Regulatory Commission (NRC) in making his determination**
 - DOE prepares a “Waste Determination Basis Document”
 - NRC reviews and provides a Technical Evaluation Report to inform the Secretary’s decision

Section 3116 (a) Criteria

- Does not require permanent isolation in a deep geologic repository
- Had highly radioactive radionuclides removed to the maximum extent practical
- **(A) Does not exceed concentration limits for Class C low-level waste and will be disposed of:**
 - In compliance with the performance objectives set out in Subpart C of 10 CFR 61
 - Pursuant to a State-approved closure plan or a State-approved permit
- **(B) Exceeds concentration limits for Class C low-level Waste and will be disposed of:**
 - In compliance with the performance objectives set out in Subpart C of 10 CFR 61
 - Pursuant to a State-approved closure plan or a State-approved permit
 - Pursuant to plans developed by the Secretary in consultation with the NRC

NDA Section 3116 (b)

- **Section 3116 (b) establishes specific monitoring responsibilities for the NRC**
- **Monitoring is in coordination with the affected State**
- **Monitoring restricted to ensuring disposal actions are in compliance with the 10 CFR 61, Subpart C performance objectives**
- **Upon discovery of “non-compliant conditions,” NRC is to notify:**
 - DOE
 - Affected State
 - Two congressional committees

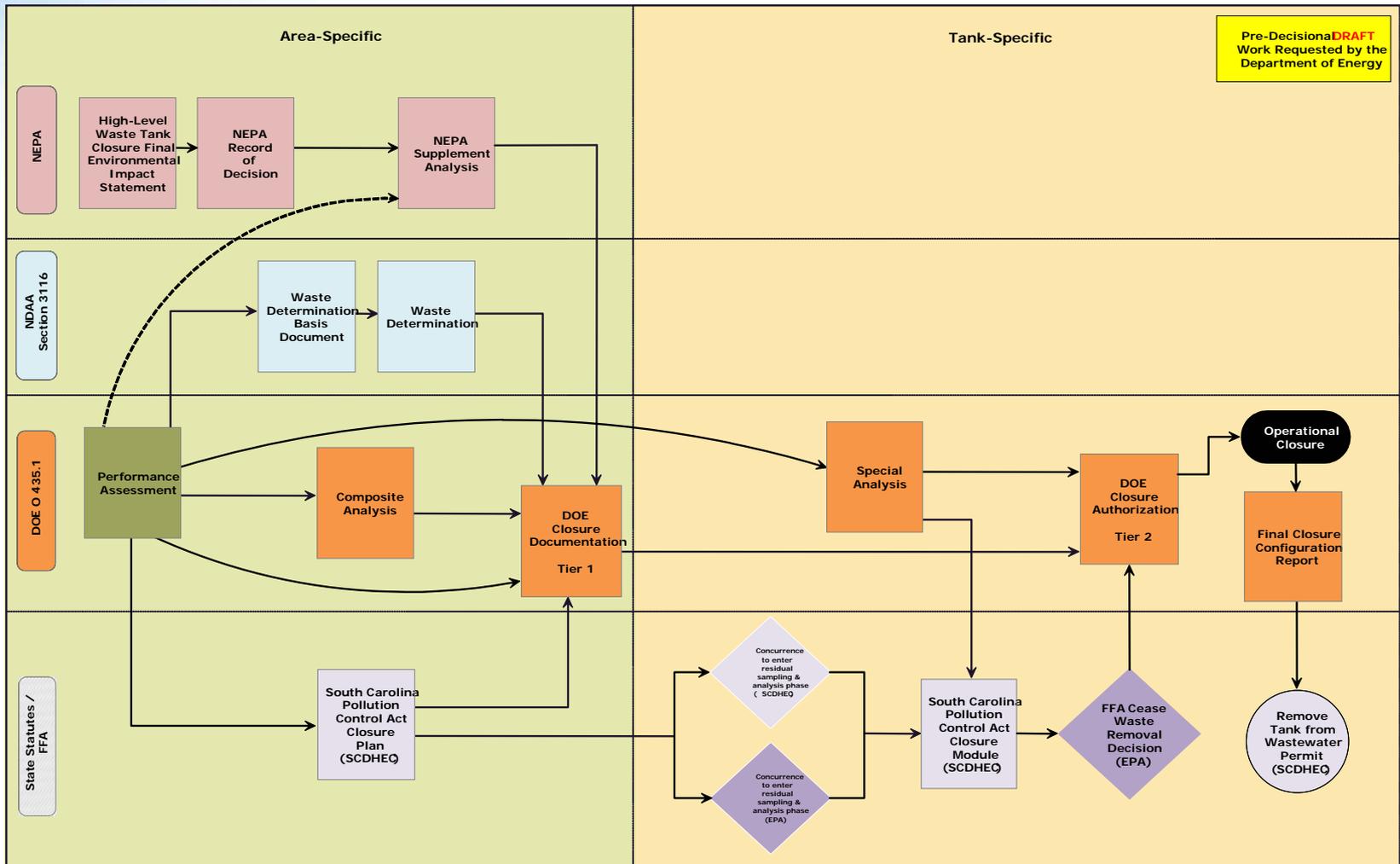


§3116 Scope at SRS

- **Salt Waste Disposal at the Saltstone Disposal Facility**
 - **Currently in “Monitoring Phase”**
- **Residuals associated with closure of waste storage tanks and ancillary equipment**
 - **F-Tank Farm**
 - **H-Tank Farm**



Regulatory Documentation Path to Operational Closure of F-Tank Farm



SAT - Draft Revision E - 3/26/09



F-Tank Farm Activities

- **Performance Assessment**
 - FTF PA, Rev. 0 reviewed by LFRG, EPA, SCDHEC, NRC and SRS CAB
 - Rev. 1 is on-going
- **FTF Waste Determination Basis Document**
 - Currently under development
- **FTF General Closure Plan**
 - Initial review by DOE-SR complete; resolving comments

Key In-Field Activities – What’s Important

- **Waste Removal Operations**
 - “Begin with End in Mind” – Define “Needs” for Regulatory Case **BEFORE** you start
 - A Picture is Worth a Thousand Words
 - Sharp, clear pictures and video with date and time stamps
 - Charts and graphs that show diminishing returns
 - Define data necessary to know when you done and define end states
 - Plot and analyze data on an on-going basis
 - Flat lines are unambiguous – Slope lines ... not so much

Key In-Field Activities – What’s Important

- **Tank Residuals Characterization**
 - Residuals volume – “mapping”
 - Large potential uncertainty
 - Plan ahead with mapping landmarks staged
 - Rad and non-rad characterization
 - Representative sampling must be demonstrated
 - Strong technical and defensible basis required
 - Special analytical methods to achieve desired Detection Limits
 - Everything must be referenced and documented
 - Assume everything will be reviewed with a critical eye by the “Public”

