

RADIOACTIVE WASTE MANAGEMENT PROGRAM (RW)

OBJECTIVE

RW.1: The Site Office has implemented a Site-Wide Radioactive Waste Management Program that complies with DOE requirements and the Site Office oversight processes and procedures have ensured appropriate and effective implementation of the program by the Site Contractor. .

CRITERIA

1. Site Office procedures and mechanisms ensure that the site contract contains appropriate requirements for radioactive waste management. Provisions are also in place to flow the requirements into subcontracts and to periodically assess the adequacy and currency of contract requirements in view of the work under the contract and DOE expectations (Department of Energy Acquisition Regulations (DEAR), DOE P 450.4).
2. Site Office procedures and mechanisms ensure that the Site Contractor has adequate procedures, facilities, and personnel having competence commensurate with their assigned responsibilities to comply with contractual requirements to systematically plan, document, execute, and evaluate the management of DOE radioactive waste in accordance with DOE O 435.1. A radioactive waste management basis has been developed, reviewed, approved, maintained, and implemented for each radioactive waste management facility, operation, and activity. Site Contractor radioactive waste management program requirements have been flowed into applicable subcontracts (DOE O 226.1A, NA-1 SD 226.1A, DOE O 435.1, DOE M 435.1-1).
3. Site Office procedures and mechanisms ensure that the Site Contractor has a robust feedback and improvement program that includes comprehensive assessments of the radioactive waste management program. Assessment results indicate a compliant program. Issues identified during assessment at all levels are managed, tracked, and effectively resolved. Lessons learned are identified. Performance metrics are tracked (DOE O 226.1A, NA-1 SD 226.1A, DOE O 435.1, DOE M 435.1-1).
4. The Site Office has a documented sitewide radioactive waste management program that uses a systematic approach for planning, executing, and evaluating the sitewide management of radioactive waste (DOE O 435.1, DOE M 435.1-1)
5. Site Office oversight and operational awareness processes such as assessments, reviews, surveys, and walkthroughs verify that site radioactive waste management programs ensure compliance with DOE O 435.1 and other regulatory (Federal, State, and local) requirements. Site Office assessment results indicate a compliant and effective program. Issues identified during oversight assessments at all levels are managed, tracked, and effectively resolved (DOE O 226.1A, DOE O 435.1, DOE M 435.1-1, NA-1 SD 226.1A).

6. Issues identified during previous reviews (e.g. CDNS Biennial Reviews, HSS reviews, self-assessments) have been appropriately resolved, corrective actions have been completed and are adequate, or a clear path to completion is indicated (DOE O 226.1A, NA-1 SD 226.1A).
7. The Site Office has sufficient staff, and assigned personnel have adequate technical competence, to oversee the performance of the contractor in this functional area (NA-1 SD 411.1-1C).

APPROACH

References:

DOE O 226.1A, *Implementation of Department of Energy Oversight Policy*

- DOE O 435.1, *Radioactive Waste Management*
- DOE M 435.1-1, *Radioactive Waste Management Manual*
- DOE P 450.4, *Safety Management System Policy*
- NA-1 SD 411.1-1C, *NNSA Safety Management Functions, Responsibilities and Authorities Manual (FRAM)*
- NA-1 SD 226.1A, *NNSA Line Oversight and Contractor Assurance System Supplemental Directive*

Record Review:

- Review site contract requirements and implementing mechanisms for site contract provisions and site radioactive waste management program plans.
- Review radioactive waste management basis for selected radioactive facilities and activities and implementing mechanisms for the site's radioactive waste management program as well as for individual facility or activity radioactive waste management bases.
- Review assessment and oversight program requirements and reports of results by the NNSA Site Office, and Headquarters, including the process and results for managing issues identified during assessments and oversight reviews.

Interviews:

- Interview NNSA Site Office managers and staff associated with radioactive waste management program development, approval, implementation, and oversight.

Observations:

- Tour radioactive waste management facilities with Site Office personnel responsible for program oversight and Facility Representative if applicable; observe radioactive waste management activities within individual facilities and activities; observe any operational activities, drills, and exercises associated with radioactive waste management activities conducted during on-site review period.