Low-Level Waste Disposal Facility Federal Review Group (LFRG) Review of Waste Management Area C Performance Assessment (WMA-C PA)

Hanford Site

Sherri Ross LFRG Review Team Lead

LFRG Review of the WMA-C PA

- Team chartered to review the PA for technical acceptability to support DOE publication
 - ▶ PA prepared to serve as technical analysis for a future waste determination (WD) per the waste incidental to reprocessing (WIR) evaluation requirements of DOE Manual 435.1-1.
 - WD requires compliance with DOE Manual 435.1-1 Chapter IV plus the performance objectives in 10 CFR 61.40 through 61.44.
 - The evaluation process includes review of the PA by NRC under a consultation role
 - The process will also involve review of the PA by regulators and public

LFRG Review Team

Sherri Ross - Team Lead James McCarthy - Team Member Barry Lester - Team Member Roger Seitz – Team Member Susan Krenzien – Team Member Steven Thomas - Team Member Howard Pope - Team Member Gregory Shott - Team Member Beth Moore - Team Member Ming Zhu - Team Lead Trainee Justin Marble - Team Lead Trainee

Team Activities

WMA-C PA on LFRG server

7 Webinar Discussions

Onsite Review

Outbrief

Draft Report to LFRG

LFRG Vote Approved

Final Report

Issues Closed

PA approved for publication

January 14, 2016

Jan 27 - March 16

March 21-24, 2016

March 24, 2016

June 7, 2016

July 6, 2016

August 5, 2016

August 15, 2016

August 29, 2016

NRC and Washington Ecology representatives observed the LFRG review

Definitions

- A key issue is a problem or concern that affects the validity or utility of the technical basis documentation.
- A secondary issue is a problem or concern that is of sufficient importance that it needs to be addressed, but does not constitute a key issue.

Observation and Best Management Practices

- Observations typically consist of recommendations to enhance the presentation of information and clarity of the document.
- Best Management processes, procedures, modeling approaches, etc. that the site has implemented that the LFRG believes are cost effective, technically sound and should be recognized and shared with other sites.

Results of Our Review

- ■1 Key Issue
- 27 Secondary Issues
- 9 Observations
- 6 Best Management Practices
- 2 Recommendations

The Key, 26/27 Secondary Issues, and Observations were closed prior to DOE's approval to publish PA.

Key Issue - Intrusion Scenarios

- The intruder scenarios need to consider intrusion into a pipeline after 100 years and intrusion into a tank after 500 years to be consistent with expectations of DOE Order 435.1 and NUREG-1854.
- Also, when describing the intrusion scenarios it would be beneficial to add some discussion of the relative likelihood.

Secondary Issues

- 1 Review Comment Record and Typographical Errors
- 2 Large Ra226 Inventory Uncertainty not Addressed
- Selenium animal fodder plant-soil concentration ratio
- 4 Atmospheric Dispersion Calculation
- 5 Point of Assessment and Timing Assumption
- 6 Additional documents needed for closure / correction in PA
- 7 Modeling Approach
- 8 Key Assumptions
- 9 Closure at 2020

Secondary Issues

- 10 Constituents of Concern Screening based on Kd
- 11 Long term performance evaluation
- 12 Uncertainty analysis based on peak doses
- 13 Grout degradation (Open to be added to PA Maintenance Plan)
- 14 Context for performance assessment
- 15 Features, Events, and Processes
- 16 Grout Diffusion Coefficient Application of Table 6-4
- 17 Vertical Dispersivity in saturated zone
- 18 Consideration of Degraded Performance

Secondary Issues

- 19 Grout and Cover Design Assumptions
- 20 Input assumptions for grout/cement, including specific values for Kd
- 21 Executive Summary
- 22 Base Case description
- 23 Inhalation Dose Conversion Factor
- 24 Software and Model Quality Assurance
- 25 PA role in WIR evaluation process
- 26 GoldSim Inventory Uncertainty Simulation
- 27 Regression Plots

Observations

- 1 Tank Volume Values
- 2 Clarify of Quote
- 3 Intruder DCFs, Intake and Use Factors
- 4 Dose Assessment Parameter Selection
- 5 Confusing Conclusion
- 6 Grout Durability
- 7 Upper Bound Inventory for Tank C-105
- 8 Tables and Figures Placement
- 9 Chromium Discussion

Best Management Practices

- 1 Webinars
- Use of Sensitivity Analyses to address stakeholder questions
- 3 Groundwater and Vadose Zone Executive Council
- 4 Software Quality Assurance
- 5 Scoping Meetings
- 6 Comprehensive Modeling

Recommendations

- 1 Clarify in DOE O 435.1 regarding Tank Closure
 - Current DOE M and G 435.1 does not provide enough direction or guidance between what is required for tank closure plan versus disposal facility requirements
- 2 Combine Performance Assessments and Waste Determinations
 - Consider doing a single PA for 200 East and West after WMA-C closure decisions