

Summary Notes from 24- 25 February 2009 Office of River Protection Waste Management Area
C Performance Assessment Input Meeting

Attendees: Representatives from Department of Energy-Office of River Protection (DOE-ORP), DOE Richland Operations Office (DOE-RL), DOE-Headquarters (DOE-HQ), the Washington State Department of Ecology (Ecology), and the U.S. Nuclear Regulatory Commission (NRC), met at the Ecology offices in Richland, Washington on 24 & 25 February 2009. EPA Region X staff participated on 25 February 2009 via teleconference.

Discussion: DOE is pursuing closure of Waste Management Area C (WMA-C) located at the Hanford Site. At some point in the future, DOE and NRC will consult on waste determinations for these tank closures; additionally these tanks will be closed in coordination with EPA and Ecology in accordance with the Tri-Party Agreement (TPA) and State-approved closure plans. The DOE, NRC, EPA, and Ecology met for the first time to discuss the process for an upcoming series of technical exchanges on the proposed inputs and assessment context for a WMA-C Performance Assessment (PA). The technical exchanges are intended to capitalize on early interactions between the agencies with a goal of developing DOE's WMA-C PA. Technical discussions during the meeting are intended to allow for the clarification of general modeling approaches and for the identification of other specific questions.

Topics: The following specific topical areas were discussed during the meeting:

1. *Introduction to Overall Scoping Process*
2. *Goals*
3. *Overview of Scoping Process*
4. *Review of Scoping Process Paper*
5. *Working Session Meetings*
6. *Decision Making*
7. *Data Packages*
8. *Assumptions*
9. *Overview of Future Meeting*

Summary: The following summarizes the discussion during the meeting, by topical area.

Introduction to Overall Scoping Process

- DOE-ORP will be preparing the final parameter input packages for the WMA-C PA. DOE-ORP and DOE-HQ have initiated this scoping process as a way to ensure that needs of all the regulatory agencies involved in closure of WMA-C are addressed in these documents.
- Ecology Staff indicated the need that this process address not only the residuals left in tanks after waste retrieval, but also the contamination in the soils, groundwater, and the interaction between them.

Goals

- Ecology staff stated the goal of closing WMA-C within about 10 years.
- NRC staff stated the goal of providing similar expertise and input here as they have on similar processes at other DOE sites.
- DOE-ORP staff stated the goal of closing WMA-C within about 10 years.
- DOE-RL staff stated the goal of ensuring that tanks, ancillary equipment, soil, and groundwater contamination are all addressed
- DOE-HQ staff stated the goal of ensuring that every regulatory agency involved in this process has their information needs met by this process.

Overview of Scoping Process

- DOE-ORP staff stated that this process needs to meet a number of regulatory needs and provided an overview of the overall scoping process.
- Meeting participants discussed general aspects of the scope of this effort, including the role of the WMA-C performance assessment versus the composite analysis.
- Meeting participants discussed the differences between performance assessment as discussed in the TPA versus DOE Order 435.1; composite analysis under 435.1 versus cumulative assessment; closure under TPA versus RCRA versus 435.1. As a result, a glossary was developed for participants clarifying these terms (which will be updated as

the process proceeds). Other terms addressed in the glossary include System, Component, Soil, Tank Farm, RCRA Corrective Action, Closure, and Waste Management Area.

- Meeting participants discussed how notes from this meeting will be captured, disseminated, updated, and finalized over the following 2 weeks. Final notes will be published and posted on a publicly-accessible web site. Meeting participants agreed that meeting notes from similar processes at other DOE sites would be useful, i.e., <http://www.em.doe.gov/Pages/3116Summaries.aspx>.

Review of Scoping Process Paper

- The scoping process paper developed for this meeting is a publicly releasable document. It is intended that this document will be revised and edited to serve as the charter for this scoping process. Following this meeting, the paper will be updated and disseminated along with the meeting notes.
- DOE-ORP staff noted that the primary goal of this process is to reach consensus on the scope, methods, and data that will be used in the preparation of the analyses that will support all involved regulatory agencies' decision making needs.
- DOE-ORP staff clarified that the agencies involved in this effort include DOE, NRC, Ecology, and EPA Region X. Consensus was that these will be referred to as the Regulatory Agencies. It was noted that there are other agencies and organizations, e.g., State of Oregon, Native American Tribal Nations, Hanford Advisory Board that may also be involved as participants but which do not have a direct regulatory role.
- Meeting participants agreed that one of the primary goals is to ensure that the products from this effort will support Section 2.5 of Appendix I of the TPA.
- DOE-RL staff noted that this effort needs to identify the linkages to the DOE M 435.1-1 Composite Analysis.
- DOE-ORP staff noted that it is not a goal of this effort to interpret or draw conclusions about the results of the analysis regarding regulatory standards. However, there will be interpretation of the results with respect to model results and understanding the accuracy of the results.
- Meeting participants agreed that this effort needs to ensure that specific end point uses and needs are addressed, e.g., Native American exposure scenario.

- DOE-RL staff asked that the scoping process paper be revised to accurately represent what DOE-RL's role in this process would be.
- Meeting participants agreed that the work of this effort would refer to the analysis as a performance assessment in the context of TPA Appendix I.
- Meeting participants discussed the need to develop the general conceptual site models early on in this process before discussing specific model parameters and assessment endpoints.
- Chris Kemp, DOE-ORP, was identified as the Administrative Officer and formal point of communication for this effort (phone (509) 373-0649, email: Christopher_J_Kemp@orp.doe.gov, address: Mailstop H6-60, P.O. Box 450, Richland, Washington 99352).
- DOE-ORP staff indicated that a formal communication plan will be prepared to support this effort.

Working Session Meetings

- Meeting participants identified who the Lead participant would be from each regulatory organization.
- Meeting participants will also include Members, Subject Matter Experts, and Observers. Participating organizations will provide the names of the members they expect to participate in this effort to the Administrative Manager.
- Participants in meetings may include representatives of the Hanford Advisory Board, the State of Oregon, Native American Tribal Nations, and interested individuals. DOE-ORP will be preparing an invitation to these parties.
- Meeting participants discussed schedule and expectations for working session meetings, including what general topics would be addressed in what order.
- NRC staff emphasized the importance of starting the working session meetings with a high-level discussion of the conceptual models before getting into the details of specific parameters.
- Meeting participants agreed to re-order the proposed meeting schedule to order topics in a way that participants felt would better support the overall needs of this effort (see attached). Additional topics were added to the proposed schedule of meeting topics, or to the agendas of specific meetings. For example, sensitivity and uncertainty analysis will

be addressed in a variety of working session meetings and cumulative assessment will be addressed in a new stand-alone session. (See attached Table)

- Meeting participants reviewed the prototype working session meeting agenda and discussed planned protocols for note taking, reviewing, and posting.

Decision Making

- Meeting participants discussed how these working session meetings would make decisions and the extent to which consensus would drive overall decision making. Meeting participants agreed that the overall goal of the process is to ensure that each regulatory agency's information needs are met for regulatory decision making purposes. Meeting participants agreed that if consensus cannot be reached in a working session, then a path forward will be developed at that time, including timelines, for developing additional supporting information.
- Decisions from the working sessions will be documented in the final performance assessment and in the meeting notes.

Data Packages

- Meeting participants discussed how data packages would be prepared, disseminated at least 4 weeks prior to a working session meeting, and updated based on the working session discussions. Alternate data packages may be provided by other participants. If provided to the Administrative Manager 2 weeks in advance of the meeting, then these packages will be distributed to all participants prior to the meeting.
- Input packages used for the meetings will not be revised and issued as final documents. The input packages will be issued as publicly releasable information but will be marked "draft – pre-decisional". Following a working session meeting, input from the meeting will be used to update information presented in the data packages before it is incorporated into the draft performance assessment.
- Meeting participants discussed whether revised and updated sections of the draft performance assessment would be circulated for additional review following the workshops. Consensus was that formal additional review cycles were not needed, but revised sections of the performance assessment would be posted on a web site and available for review by interested parties.

Assumptions

- Meeting participants discussed the assumptions underlying this process that were presented in the draft scoping process paper.

Overview of Future Meeting

- DOE-ORP staff provided a brief overview of the residual inventory topic area that will be the subject of the first working session being scheduled for May 2009.

Table. Proposed Schedule of Working Sessions		
#	Subject	Date
0.	Goal/Process	2/24 – 2/25
1.	Residual Inventory	5/5-5/7
2.	Assessment Context/ General Conceptual Model	7/7-7/9
3.	Soil Inventory	9/1-9/3
4.	Man-made system #1 (detailed conceptual model, data) (recharge)	10/27-10/29
5.	Natural system (detailed conceptual model, data)	1/26-1/29/2010
6.	Man-made system #2 (detailed conceptual model, data) (recharge)	3/30-4/1/2010
7.	Dosimetry (detailed conceptual model, data)	TBD
8.	Cumulative Analysis (as well as topics not covered sufficiently above)	TBD
9.	Numeric codes	TBD
10.	Results from Initial Model Results (contents of Maintenance Plan)	TBD
11.	Placeholder	TBD
12.	Results from Final Model Results	TBD