

EFCOG Best Practice #97

06/05/2011

Best Practice Title: Waste With No Identified Path for Disposal (WWNP)

Facility: Savannah River Site, South Carolina

Point of contact: Sonny Goldston (803-507-1310) - Savannah River Nuclear Solutions

Brief Description of Best Practice:

Savannah River Nuclear Solutions has implemented a process to enhance the waste with no identified path to disposal requirements of DOE Order 435.1. The intent of the WWNP process is to get the DOE Field Element Manager's approval prior to generation of this waste stream. Once the approval is obtained, there is no requirement to review the status of the WWNP on a periodic basis. This waste is normally very difficult and expensive to manage (e.g. high dose rates) and many times will become a low priority within budget constraints to develop a disposition path. SRNS implemented an annual review of these waste streams to ensure that DOE and contractor management continue to agree and provide the appropriate funding priority. In addition, some onsite processes have the "potential" of generating WWNP (e.g. non-defense TRU). SRNS identifies those potential WWNP generations in the annual review approved by DOE to ensure there are "no surprises" if WWNP waste are generated.

Why the best practice was used:

The process was developed to ensure DOE and contractor management are kept aware and agree upon the identified WWNP and on the potential generation of WWNP through waste management processes (e.g. repacking TRU).

What are the benefits of the best practice?

The benefits include a good communication tool between DOE and the contractor on the importance of developing disposition paths for WWNP and in identifying potential generation of WWNP through existing or future waste management activities.

What problems/issues were associated with the best practice?

Getting DOE and the contractor to allocate budget to develop a disposition path for a normally small volume of waste was difficult.

How the success of the best practice was measured:

Success of the WWNP process is measured by the fact that the initial list of WWNP has decreased over the years through the continuous emphasis on developing treatment/disposal paths for this waste.

Description of process experience using the best practice:

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Initially identifying WWNP was not difficult. However, getting DOE and contractor management not to lose focus on identifying disposition paths for this waste was a challenge in the light of meeting contractual performance goals. In an effort not to lose focus, the annual review for WWNP for disposal was initiated. This forced the contractor to evaluate the disposition progress annually and report this progress to DOE. It also forced DOE to approve/disapprove the contractor's progress and provided the contractor with a basis for allocating budget dollars to identify disposition paths and reduce the volume of WWNP.

ISM Core Function 3: Develop and Implement Hazard Controls